

# Appendix 2a

## Responses by Consultation point

3-Vision and Strategic Objective

Page 2 to 896

4- Sustainable Development in Dacorum

Pages 897 to 1244

5- Spatial Strategy for Growth

Pages 1245 to 2291

### 3 Borough Vision to 2038 responses

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3
<b>Person ID</b>	1253611
<b>Full Name</b>	Wilfried Bernard
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4
<b>Person ID</b>	1253618
<b>Full Name</b>	Andrew Farrow
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11
<b>Person ID</b>	1253652
<b>Full Name</b>	erica vilkauls
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	This is naive. All that will happen is richer local people will band together with developers and push through plans. It happens now.
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS21
<b>Person ID</b>	1253669
<b>Full Name</b>	Amy Harman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
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<b>Comment ID</b>	EGS27
<b>Person ID</b>	1207707
<b>Full Name</b>	Mike Beavington
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	If Hemel Hempstead town centre is to be a focus for shopping/retailing it will have had to keep pace with changing shopping habits. To conserve and protect the natural environment DBC will need to work with the Boxmoor Trust in the relevant areas.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS33
<b>Person ID</b>	1253620
<b>Full Name</b>	John Howard
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	With the on-going mention of new affordable housing is this just for the private sector. I cannot see how, with the average house price being listed as £453,950.00 that any local first time buyer/s earning the average income of £33,984,00 can afford to buy a home. . Why when back in the late 50,s through to the early 80,s was there enough housing for the new town of Dacorum to support a vibrant industrial estate, much of which employed many manual operatives, and yet now the businesses and work force has been demised is there a real requirement for new homes to support the foreseen

economic growth Of the planned 16,500 new homes how many are planned to be ARCH owned and be let at affordable rents.

With the new housing plan has the infrastructure planned for more community centres, Doctors surgeries, shops, amenity supplies and usage. Will there also be sufficient off road parking for the residents of these new proposed properties.

With regards to the green and renewable energy are there any such plans to use bio mass boiler systems to produce a cheap affordable heating system in any of the new builds. Are there any infrastructure designs for wind farms within the Dacorum, South west Herts plan?

Will the new open green and connecting spaces be maintained by the local authorities are just left to fall into decline like so many other areas, which appears to stop locals from using as walking routes.

Dacorum has 5 railway stations, not listed in your economic growth section as is not Luton and Heathrow airports. These could be mentioned to any new potential businesses as an alternative to road freight transport for either shipping there goods or receiving materials.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS78

**Person ID**

482748

**Full Name**

Dr Ian Rennie

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

No

**Comment**

This Vision and the Strategic Objectives has been developed prior to the current Conservative Governments objective that new developments should take place in brown field/urban sites in the South of England and most othe development in the North of England. There are already plans in place for considerable growth in housing in Dacorum and the impact of such development on the local environment will be significant. These plans cannot be considered Sustainable with Climate Change because of the loss of greenbelt and the impact on the water aquifer. Climate change is currently--and projected in to the future will produce more extremes in weather. In the case of water that means we will experience heavy rain in the winter but prolonged drought in the summer. These proposals with the significant increase in demand

for water will result in the drying up of the River Gade and River Bulbourne. These are Chalk Streams and protected under many regulations. In no way can you say these developments will result with the status of Good Quality Water when there will be no water running, they will be dead. Water companies in our area, also Thames Water and Anglia water to the North have described their aquifers as depleted. Any significant increase in demand will result at frequent droughts.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS86

**Person ID**

1255447

**Full Name**

Andrew Sparrow

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

As the vision pertains to Berkhamsted, I support the objective of the new plans to the south and southwest of the town. I understand that there is a proposal for an alternative development to the east of the town, known as Bulbourne Cross, and I would like to register my opposition to that scheme, as it pertains more to Bourne End and Hemel Hempstead West than it does to Berkhamsted, and does greater violence to green belt land.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS101

**Person ID**

1254846

**Full Name**

James Martin

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The local plan that was adopted only in 2017 provided sufficient growth in the right areas of Dacorum, and particularly in Berkhamsted and Northchurch. What is being proposed is effectively the destruction of Northchurch and Bourne end as separate entities and is entirely disproportionate. The emerging plan has no reference to travel both within the borough and outside and as such I don't think that the plan can be demonstrated to be valid.</p> <p>The environmental sustainability evidence is also not plausible in this section and there is no reference to air quality which would be significantly reduced.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS116
<b>Person ID</b>	1256432
<b>Full Name</b>	Rob Schafer
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I cannot reconcile the climate change and environmental ambitions with the huge scale of development, the environmental impact of the construction of the homes and roads, the increased pressure on the roads and natural areas. The vast majority of these homes will be car commuting households.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS128
<b>Person ID</b>	1142526
<b>Full Name</b>	Mrs Angela Goddard

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>You want to cram the maximum number of houses into historic market towns such as Tring and Berkhamsted at minimum cost, with no care for the destroying of green belt or the infrastructure to sustain the increase of both people and cars.</p> <p>Northchurch is a village community in itself and you are totally disregarding the narrow lanes and difficulties there will be moving traffic around, particularly by the school on New Road. A child has recently been killed in the High Street by a speeding car and the bulk of traffic will only get worse.</p> <p>The government's assessment of the number of houses needed in the south east in the future is unreliable at best, and once built, the area will be spoilt for ever.</p> <p>While more housing is no doubt needed, it should be social housing that young people and front line workers can afford, not poorly built, crowded houses selling for around £1m by Taylor Wimpy, who have no care for the area and are making huge profits.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS142
<b>Person ID</b>	1256692
<b>Full Name</b>	Cliff Slynn
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	The section on the Tring statement does not reflect the proposals in the plan. Added to this the increase in housing will increase the the size of Tring by far too much risking the heart and unique qualities of the area.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS156
<b>Person ID</b>	1257066
<b>Full Name</b>	Alan mrpetethomas
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The plan envisages a growth in population far in excess of that from the existing population. As a consequence there is an incorrect number for housing required. The destruction of green belt and green sites is therefore unnecnsary and should not go ahead.</p> <p>Any housing built should be of higher density on existing housing and brown field sites.sites. Any housing built should be carbon neutral, theCouncil has agreed there is a CLIMATE CRISIS but building CO2 emmitting houses will only add to this.</p> <p>Please can someone look at the big picture? If you add the houses planned here to those being planned by Aylesbury Vale we are creating a massive housing estate from Hemel Hempstead to Ayesbury, the A41 is already choked with traffic bringing pollution and noise this will only increase.</p> <p>Please take responsibility for nature Iknow Developers can make huge profits building houses in this area but we need to keep oit GREEN for us our children and grandchildren. Once it has gone it can nevre be reinstated.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS157
<b>Person ID</b>	868491
<b>Full Name</b>	Mr Graham Hoad

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	Commendable vision
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS161
<b>Person ID</b>	1207786
<b>Full Name</b>	Anne Foster
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I believe the document is full of excellent aspirations. However as a Berkhamsted resident, for the most part I can only speak about Berkhamsted where the reality falls well short of the aspirations.</p> <p><i>Berkhamsted will accommodate growth of at least 2200 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment in sustainable transport initiatives open spaces and sports facilities.</i></p> <p>How does development enhance the town centre, or strengthen its function as a key market town – when the town centre cannot expand because it is constrained by residential development? I note there are no proposals for town centre enhancements – this is just words</p>

**There appears to have been a decision taken that Berkhamsted must take substantial growth because of its current size with no cognisance given to its constrained location, topography, and the impact on the town of the proposed developments.**

Indeed the SHS, carried out because the Inspector at the time of the Core Strategy, said that further consideration of the constraints of the settlements in determining the Hierarchy was needed, still does not take that into consideration. It effectively considers only the size, facilities and public transport links with Hemel Hempstead.

The resultant proposition of a 24% increase in Dwellings, most of which are at the top of the valley sides where the only feasible means of transport is by car is completely unsustainable.

Its constrained and steep sided valley location, mean that the " *significant new investment in sustainable transport initiatives ...*" which are essentially enhancements, for pedestrians and cyclists, ( minor junction modifications, more crossing points and additional foot ways) do nothing to mitigate against additional traffic from developments located along Shootersway, where, as stated, the only feasible means of transport to access the towns facilities, and station is by car. No safe cycleways from the developments are proposed, even if people can make it up the hill. (or there is mass growth in the use of electric bikes) There is an acceptance of this in the Transport and Movement sections 2.13, 2.16.

*P 23.119 recognises the key challenge for Berkhamsted of congestion, constrained roads, difficulties with bus movements and limited cycling infrastructure, and subsequently acknowledges that "there are few opportunities for new road capacity in the town"*

Yet whilst acknowledging the existing issues, the Sustainable ( joke word) Transport Study proposes nothing to address them, and indeed DBC is content to exacerbate them, with a further 2200+ dwellings.

Para 23.121 – *ensuring growth areas on the edge of town are well connected; accessible to the town centre and station (only by car for most); public and sustainable transport options are enhanced.* How is this to be achieved? Where are the detailed proposals. There is nothing in the Transport Study proposing sustainable transport options from the developments to the town centre/station.

In fact the Transport Study as already mentioned concentrates only on minor junction improvements for pedestrians and does not even acknowledge Shootersway ( where a substantial amount of the development is proposed) as a major thoroughfare, categorising it as simply a residential road, serving county lanes and Champneys!

I welcome the proposed provision of a secondary school in the West of Berkhamsted, given that on current forecast Ashlyns is already 1 class short of meeting current need without the proposed developments, and catchment issues mean it is the children in W Ward and Northchurch who will have issues getting places in their local school.

The proposals for open spaces and play areas on the sites are welcomed, however I understand those detailed in the IDP are simply formula based aspirations, with no guarantee that they will materialise. Recent acceptance of large developments (Bearroc 1 and 2) with no mandated requirement for play areas or significant open space, must cast doubt on these proposals.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS162
<b>Person ID</b>	1257378
<b>Full Name</b>	Jackie Jones
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Whilst I believe in general the vision/objectives are good:</p> <p>*I believe that it would be appropriate to consider whether the covid-19 crisis will have long lasting change on the properties and services that the local population need/want. For instance, will large central retail units be required? Or will retail be more local and online?</p> <p>*Although building affordable homes is mentioned, there is no mention of social housing - which there is just too little supply of at the current time.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS166
<b>Person ID</b>	1257489
<b>Full Name</b>	louis quail
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Dear Dacorum planning

I have very strong concerns about building on green belt land, especially when there does not seem to be cross party consensus on this . The starting principal should be that the countryside belongs to every one as we all have a stake through various public pathways and then the wild life that flourishes there that we can all enjoy along with the open space that is vital for wellbeing . Importantly the biodiversity that flourishes on green belt land belongs to us all as well and should not be given away cheaply. I understand that the government has put legal pressure on councils to develop a Strategy for Growth; this is not the same thing as having to build immediately on greenbelt land as this policy might change indeed I believe it already has.

Any building should be done very cautiously with proper consultation with the local community. If I am correct there are barely any comments displayed clearly on this portal; this is not ok and reflects very poorly on the council. By this stage I should be able to see hundreds of comments. When the many councils set up their parking fine policy they were sure to include a rule where parkers had to display their ticket clearly or they would be fined. Likewise the council must make this consultation process incredibly easy for the public to see and comment on. At the moment it is only suitable for dedicated professionals and in fact excludes the public by design . A strategy this important can not be left until the decisions are sewn up between the councilors and the developers. If this was the case it would reflect very badly indeed.

(On that note I would like to draw your attention to the fact that there are no clear addresses for the planned developments or a way for the public to simply work out where the developments are precisely and the maps not of sufficient detail for us to identify these areas . Equally your map shows the development sites over the green belt colouring so we have to assume all red areas are green belt, this is not clear enough as their may be brownfield sites here which would be preferable for building , like the proposed Aldi or Lidl supermarket site near Jewsons and Northchurch . )

furthermore I see your comments here:

Responding to, planning for, and managing change requires us to engage with our residents, businesses and with the Government and our partner organisations. This allows us to act in the best interests of our residents as the Plan is progressed and be aware of all views and latest opinions. In 2017 we consulted on the issues and options facing the Borough in the future. Wherever possible, we have responded positively to previous representations whilst recognising this process has not been easy - as we will have to make hard and often unpopular decisions.

Over the past three years we have developed evidence, engaged with key stakeholders and partners as well as landowners to develop this document. Using this evidence, alongside responses from the previous consultation we have developed an Emerging Strategy for Growth for Dacorum.

I am concerned about this because you have said you have engaged with key stakeholders , but I only found out about this recently how have you engaged with the community ? your portal is very difficult to use, has massive amounts of information and is only accessible to certain types of professionals not the wider public.

At the very least developments built on green belt land should be of the highest quality and should actively aim to solve the housing crisis by being aimed at social housing and affordable homes for emergency workers . Building unattractive bulk standard homes executive homes like on the Belroc park development is a very disappointing response to the housing crisis. I do not believe the Belroc park development in any way is a considered project that benefits the wider

community and can be considered a development of high quality . In fact it smacks of developers looking to make an easy buck.

Here is just one articles which you might like to read which explains why we have to be cautious about how we deal with the housing crisis , because once the Green belt is gone it is gone for ever . Building more houses is a very simplistic response especially when the market demands a bottle neck of supply to keep costs high: “Property is an investment, bought in the expectation that its value will rise in the future. If prices start falling in an area, this does not stimulate demand but curtails it.”

<https://www.thelandmagazine.org.uk/articles/why-building-more-houses-not-answer>

Equally London population appears to be declining that may not help us here in Berkhamsted but it shows there is not one simple answer and reminds us of demographic change while building on greenbelt is permanent.

<https://www.theguardian.com/uk-news/2021/jan/07/london-population-decline-first-time-since-1988-report-covid-home-working>.

I am only a concerned citizen, not a professional in any way. I am dyslexic as well so excuse my grammar. So inevitably this is no doubt an incomplete response. However this is all I have time for here in my response; and until the council make it easier for us to engage by actively seeking our opinions, I don't have the confidence that you are truly listening .

I look forward to hearing from you about your first public meeting , at least the first I have heard of.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS168

**Person ID**

1257604

**Full Name**

Richard Hillier

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I write in respect of the plans for Berkhamsted. Our transport links (A41) are already stretched and quite unsafe. Some of the roads through the town are often unsafe already with the sheer volume of traffic. You can talk about providing

transportation - in the form of buses etc., but the demographic of our town is not one that will ever use public transport. It's a sad position, but that's how it is. If you walk along Kings Road, Charles Street, Doctors Commons Road, the High Street, Castle Street at rush hour for example you will witness gridlock, with large vehicles often mounting pavements and endangering the lives of pedestrians - often children on their way to school. Our town cannot take any more traffic. The A41 is a log jam at certain times, and there are often crashes. Adding 2,200 new homes to the area will make the road even more hazardous.

The effect of the plan on our greenspaces is devastating. All of that greenbelt and other farmland that will be lost to these developments. Not to mention the effect on air pollution of the added traffic.

I appreciate the need for more housing, but there are many brownfield sites that can be developed. I appreciate the fact that Berkhamsted has become a desirable place to live, but I seriously doubt these plans will do anything other than to line the pockets of developers such as Taylor Wimpey - who despite the well intentioned statements in plans such as yours, will not provide affordable housing for those that need it.

These developments will affect the quality of life of people who were born, or have moved to the area in an attempt to get away from traffic, pollution and have access to our wonderful countryside.

England is a green a pleasant land. Please keep it this way.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS186
<b>Person ID</b>	1257705
<b>Full Name</b>	Mark Barfield
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS189
<b>Person ID</b>	1257750
<b>Full Name</b>	alan Thomas
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS190
<b>Person ID</b>	1257823
<b>Full Name</b>	Thomas Ritchie
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	There is only focus on finding places for the declared housing numbers; with little evidence of serious commitment from the essential providers of the necessary levels of infrastructure.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS199

<b>Person ID</b>	1257827
<b>Full Name</b>	Sheila Ashman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	The overall principles seem sound. I'm not sure about "houses for all" as surely some people use the fantastic transport links to travel here for work.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS205
<b>Person ID</b>	488516
<b>Full Name</b>	mr hugh siegle
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>One cannot argue with the over arching themes but the reality is that this draft Plan is essentially about building an excessive number of new homes in the Borough despite many constraints, and to a lesser extent providing employment opportunities.</p> <p>The new housing will not all be in "sustainable locations" because approximately 35% of the target the Council have chosen to achieve will be built on Green Belt.</p> <p>The proposed growth will not be environmentally sustainable - it will have an adverse affect on the Chiltern hills and the character of the countryside and our valuable and rare chalk streams will be at risk.</p>

In terms of Dacorum Places, this is a missed opportunity to grow and revitalise Hemel Hempstead and the planned growth for Berkhamsted and Tring will be to their detriment and will have the opposite impact to that outlined in the Vision.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS218

**Person ID** 1258030

**Full Name** Amy Harman

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** All further development should be located to the south of Berkhamsted where a proper Masterplan can be put in place to provide a new area which would be sustainable providing an additional school, shops and connectivity. This site can also utilise the existing train station and has good access to the A41. The other sites in Berkhamsted appear piecemeal and will just add to the existing congestion in this historic market town. The existing roads cannot cope with any additional traffic and therefore the additional housing required needs to be located in one sustainable location.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS222

**Person ID** 1249904

**Full Name** Mrs Christine Ridley

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<p>Yes / No * Yes * No</p>	<p>No</p>
<p><b>Comment</b></p>	<p>This draft plan has many admirable objectives which I totally support. However, the actual plans for housing and development do not appear to deliver many of these and are not in sufficient detail with sufficient commitment to give me confidence that the aims will be achieved in the ‘finished product’.</p> <p>Furthermore, the sentence:</p> <p><i>1.8 ‘What is clear is that if all the proposals are taken forward it would have a significant impact on the Plan we are preparing but until planning legislation or guidance changes we must prepare the Plan against current guidance.’</i></p> <p>makes me question why we are being asked to comment on this plan at all if it is likely to change, Will there be another draft plan in the future which will be an amended version of this one? And will we be asked to comment once again?</p> <p>Meantime, here are my comments on the parts of this draft plan which I find concerning.</p> <p>In section <b>2.2‘Vision and Strategic objectives’</b> - The Plan Context and Challenges, the statement</p> <p><i>‘The growth offers real opportunities to deliver significant and meaningful measures to combat the effects of the climate change emergency.’</i></p> <p>And again, in the section ‘Environment and sustainability’ the statement</p> <p><i>‘Growth in Dacorum will have been environmentally sustainable and have helped to reduce the Borough’s contribution to climate change through the location and design of development, by having promoted energy efficiency and renewable energy and sustainable construction, by having facilitated a significant increase in sustainable travel modes and through having supported reductions in the use of finite resources’</i></p> <p>is obviously untrue and is simply ‘greenwash’. Building more houses can’t possibly combat the effects of climate change. Any additional building will put more strain on the climate, by using water, fossil fuels for heating, increasing traffic etc. Indeed the actual building of any houses etc. causes a significant amount of CO2 and other pollutants to be put into the atmosphere and uses a considerable amount of energy.</p> <p><b>2.4</b> In the section on ‘<b>Housing Growth</b>’, The statement</p> <p><i>‘We need to significantly increase the number of affordable homes that are genuinely affordable to local people’</i></p> <p>is a good aspiration, but the majority of homes built on the Green Belt will be much too expensive for local buyers who are looking for ‘affordable properties’ to purchase, which is why developers are keen to build there.</p> <p>Furthermore, a recent survey by estate agents has shown that 25% of current sales in Dacorum are to people moving from London, so many of the new properties may well be bought by people moving from other areas, who are likely to want to commute back into the city to work each day, causing pollution and congestion as a consequence.</p>

*2.4 In addition, the Borough's high average house prices means that buying market housing is increasingly difficult for many households. The dream of owning a home is now out of reach for the majority of young people with the average age of house purchase currently being 32 years old. We need to significantly increase the number of affordable homes that are genuinely affordable to local people. This in turn should also aid households to live in adequately sized accommodation where they may have outgrown their current home.*

Increasing the number of affordable housing in Dacorum is a laudable aim, but unfortunately, merely building more houses does not tend to decrease house prices. The borough needs a to build more council houses to rent at a reasonable rate, so that local people can afford to live in them.

**2.109.2***'recognises the importance of a diverse range of 'main town centre uses', including retail, leisure, entertainment and more intensive sport and recreation uses (e.g. cinemas, restaurants, pubs, health and fitness centres), offices and the arts'*. However, there is no mention of improving access to the arts in Hemel in this draft plan – no theatre, concert hall, visual art centre. Does the council think that local residents are not interested in the arts? With such a large population planned, surely the least the council could provide is some sort of arts centre for the benefit of the local people. This would undoubtedly add to the vibrancy of the town, especially to the evening economy, which is currently more or less dead in Hemel at the moment

**2.15** Under the 'Transport and movement' section, the aspiration:

*'We are developing detailed Sustainable Transport Plans for our main towns to identify the transport interventions that are required to deliver growth, and ensuring development is well connected and less reliant on the car over the long term. Growth will deliver attractive opportunities to travel by bus, foot or on a bike. Future technology will be promoted to deliver and support low-carbon transport. Electric vehicles of all types (including electric bicycles) will feature strongly in this, and necessary infrastructure will be provided to ensure the usability of such vehicles'*

is admirable, but at the moment the borough has not got a good track record for public transport or encouraging bike use. In Gadebridge where I live, none of the local shops have bike racks and our bus service has been reduced from every twenty mins to a bus every half an hour, and even this is nor reliable. How can we have confidence that these aspirations will be achieved, when presently they seem to be unattainable?

**Natural environment 2.20** *Making effective use of urban land can also help reduce the pressure on the natural environment by limiting the overall scale of greenfield development. New developments can also play their role by: linking to existing green networks, creating new and varied green spaces, and promoting opportunities for biodiversity and nature conservation.*

In the section: Managing the change, the aim of:

*2.44 Protecting the character of the wider countryside and the value of protected / important sites as far as possible (such as important landscapes, heritage and biodiversity.)*

**and the borough vision to 2038 3.6** 'Environmental Sustainability', the aspiration

*'The natural beauty of the Chiltern Hills and the varied character of the countryside will have been enhanced and continued to be admired and cherished.'*

will not be achieved by building houses all over our beautiful Gade Valley. The proposed spread of the Garden community in north Hemel on to the side of the Gade valley is **inexcusable**. This is very close to the area of Outstanding Natural Beauty and is outstanding in itself. Anyone who looks over the valley from Gadbridge exclaims what a beautiful view this is. Have all the councillors been over to look what building on this land will spoil for ever?

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS241

**Person ID**

1258731

**Full Name**

Tony Broadbent

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

England is in rapid change, with Covid and Brexit likely to lead to long term behavioural shifts. Alas I read of an ever growing wealth gap, so would particularly like to see emphasis, regulation and enforcement around "Providing good quality affordable homes, in particular for those most in need".

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS269

**Person ID**

1258884

**Full Name**

Paul Breckenridge

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I totally disagree with the development of green belt. There are soo many brownfield sites which have better infastructure... roads designed for heavy traffic. These areas also are cheaper and encourage development of poorer areas. Bolting onto rural communities is damaging to the environment. Encouraging urban sprawl and inzeased car and transport use. Please look at regenerating existing urban areas and better use of brownfield sites.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS277
<b>Person ID</b>	1258944
<b>Full Name</b>	Colin Sturges
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Why don't you include in your "new homes per town" figures how many homes are already in each location and the planned percentage increase? Tring might be an "inclusive market town" but its town center has grown to serve the needs of a steady increase in local population over the last seven centuries. Adding 2,700 houses (10,000 people, 5,000 cars?) is completely out of proportion. The town centre doesn't have parking enough at the moment and noone is going to be walking in to town from Grove Fields - and they're unlikely to walk to the station either, where the car-park is at capacity.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS280
<b>Person ID</b>	1258939

<b>Full Name</b>	Ed Shedd
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p><b>Comments on Section 3</b></p> <p>Theme 1: Building Dacorum's future with homes for everyone. We fully agree with the aspiration of homes for everyone. Our main comment on this theme is that it would appear the number of 16,600 new homes is an Government top down target? If so, it would be excellent to understand how the local plan changes if the target decreases.</p> <p>At present, we can see land set aside post 2038 to deal with increases in the top down target, but not for decreases. It would also appear that the Hemel Garden Communities, to be built on what was once green belt land are at the top of the list of developments to be delivered i.e. those delivered first. Would it not be more appropriate to in fill in existing urban sites first, and then understand the demand for housing and then, and only then, decide to build on the green belt?</p> <p>Theme 2: The idea of Hemel becoming a centre of enviro-tech is really exciting. And one we are in agreement with. However, the local plan as set out at present doesn't appear to apply enviro-tech to the development proposed. It is hard to see reference to digital technology which can help monitor e.g. air traffic pollution, flood risk, water flow and usage, managing ambient temperature around offices and homes with natural solutions such as soft landscaping, trees, hedgerows alongside busy roads. Nor does there appear to be thinking about how to stimulate green transport and increase in biodiversity in the towns and villages across the region. One would have thought that one would have wanted, especially in Hemel, to promote Hemel as a working example of a town with enviro-tech at its heart, such that it can increase investment in the sector and attract businesses, because of the example it is setting to the country.</p> <p>Theme 3: Again, we feel an opportunity appears to have been missed in this space. There is a significant body of research which proves that greener cities, towns and villages have lower requirements for social care and policing, lower instances of violent and disruptive behaviour amongst the community. That by embracing the environment at the heart of the plan, this in itself helps to make Dacorum happier, healthier, and safer. We are not suggesting that the aims and activities in Theme 3 are wrong, but that we simply haven't gone far enough in taking advantage of what greening the region and especially Hemel will do for citizen's health and economic prospects.</p> <p>Theme 4: We would like to see greater detail as to how the local plan creates a clean, green and attractive Dacorum. A scan of the costs of new transport solutions reveals that the majority of these solutions are "old school, car and carbon based". There appears to be little detail as to how the region will increase biodiversity within the towns, villages and rural spaces in the region. And the target of 10% increase (I think this is correct?) is almost comically low. In a country</p>

which has some of the lowest levels of biodiversity in the world, we are submitting a local plan which is centred around creating Dacorum/Hemel as an enviro-tech hub with the ambition to have biodiversity remain pretty much where it is now? One cannot but feel that the environmental benefits the local plan seeks to deliver are both too low and lacking sufficient detail on implementation as to inspire confidence. Greenwashing is an emotive word, but unfortunately an apt one with regards to this plan?

Theme 5: The words "on track" for a better transport network are worrisome. It feels like an objective which the local plan has given up on before it has begun. Surely, we should be looking to ensure that a properly functioning multi-modal transport system is in place at the start of the plan, and is a driver of a healthier, greener region.

Theme 6: Love the aspiration, but can't quite understand what the local plan means by this. Is this simply Herts IQ becoming an enviro-hub, is it all our region's citizens having accessing to the multi gigabit connections which will be de rigueur over the coming 20 years, or is it rolling out digital curriculum and health services for our communities?

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS300
<b>Person ID</b>	1258240
<b>Full Name</b>	Adele Giles
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	The overarching vision seems solid but the scale of residential development proposed for the three main towns amounts to massive over-development.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS312
<b>Person ID</b>	1259140
<b>Full Name</b>	Guy Moores

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>1 Just bring in more people from outside the area</p> <p>2 The infrastructure required to service the increase - staff for schools, doctors, sports, plumbers, electricians etc will bring more people in who will need housing</p> <p>3 Tring High Steet and surrounding roads would be gridlocked</p> <p>4 A new sewerage system would be required</p> <p>5 Large new reservoirs will be required as there is already insufficient water for the existing population during dry periods. Rivers, streams and canals will dry up or be unusable.</p> <p>The result will be that more and more people will be required who will all need housing. All land would be covered, the environment ruined and climate change accelerated.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS318
<b>Person ID</b>	1259852
<b>Full Name</b>	Imogen Wagstaff
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No

<b>Comment</b>	<p>I am pleased that Dacorum is considering the environment and sustainability in relation to climate change as part of its plan and I am glad that a climate emergency has been declared.</p> <p>I am concerned that the vision and strategies objectives listed here are too focussed on economic growth and housing at the cost of the environment and the balance with nature that we need to sustain in order for our communities to thrive. I agree that good quality, affordable home for those most in need should be a priority but the scale of the growth in terms of housing and school developments looks as though the plan is focussing on a bracket of wealth where people are able to afford a car to be able to travel to shops, etc and will be building on green belt spaces in order to accommodate them, thereby reducing nature and important ecosystems and significantly increasing the amount of road traffic.</p> <p>I would like to see a local plan with strategic objectives driven by the community with a bottom up approach, where local priorities for local people are identified and that solutions are truly sustainable, including strong plans for developing and supporting rewilding and protection of wildlife ecosystems, local food growing and local community ventures, with community need, not economic profit and development being the central driving factor.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS349
<b>Person ID</b>	1259924
<b>Full Name</b>	Bassil Aslam
<b>Organisation</b>	
<b>Agent ID</b>	1259009
<b>Agent Full Name</b>	Bassil Aslam
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	With reference to The Vision for Dacorum's Places - The Countryside and other small villages, it is considered that the Council should allow a measured level of new Housing sustainable growth within villages, such as Flamstead, so as to keep such villages from declining economically, etc.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS361

<b>Person ID</b>	1260058
<b>Full Name</b>	Redbourn Parish Council
<b>Organisation</b>	
<b>Agent ID</b>	1260042
<b>Agent Full Name</b>	David Mitchell
<b>Agent Organisation</b>	Redbourn Parish Council
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The extensive use of the Greenbelt for development between Redbourn and Hemel Hempstead goes against the purposes of the Greenbelt as described in the NPPF. Specifically, the Hemel Garden Communities project will see urban sprawl into the Greenbelt and the narrowing of the gap between Redbourn and Hemel Hempstead. In addition, the extensive use of the Greenbelt will damage the local environment and ecology adding to the problems of climate change. On these issues, Redbourn Parish Council objects to the draft Dacorum Local Plan.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS402
<b>Person ID</b>	1260241
<b>Full Name</b>	BASSIL ASLAM
<b>Organisation</b>	
<b>Agent ID</b>	1259009
<b>Agent Full Name</b>	Bassil Aslam
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	With reference to The Vision for Dacorum's Places - The Countryside and other small villages, it is considered that the Council should allow a measured level of new Housing sustainable growth owithin villages, such as Flamstead, so as to keep such villages from declining economically, etc.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS435
<b>Person ID</b>	1260485
<b>Full Name</b>	Nick Bowles
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>This might be a vision but it is not a set of strategic objectives. The word objective means that you have a destination in sight and to get there you must have a route plan. There is no such plan in evidence. Statements are made with no guidance on how they will be delivered and achieved. This is not a plan simply a wish list.</p> <p><i>e.g. The countryside will have been actively managed and enjoyed and will have continued to support a healthy local economy and diversity of wildlife. Water quality in the rivers and streams will be good.</i></p> <p>Where is the explanation of how this will be achieved? The countryside is not owned by DBC so how will they ensure its active management? What will change to ensure improved water quality ?</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS444
<b>Person ID</b>	1260507
<b>Full Name</b>	Michael Burbidge
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

\* Yes  
\* No

**Comment**

I do not believe that expanding development in Dacorum can be sustainable. Most of the building will be on green belt land reducing the food supply, green space and the natural removal of carbon dioxide. It will inevitably increase traffic, greenhouse gases and pollution.

Increasing the size of Tring by more than 50% most of which will not be in walking distance (judging by people's current behaviour) will overwhelm the narrow town centre and require considerably more parking than is currently available. The plan is to reduce the space that could be used for parking in the current market place by building on that.

Expanding Tring by this amount will destroy the large village feel and community spirit. It will generate more traffic on its narrow and poorly maintained roads. It will increase plastic and noise pollution. It will have a huge impact on the local wildlife with huge areas been taken from it and what is left turned into small corridors.

The existing attractions of the Tring reservoirs and Ashridge already suffer from too many visitors (look at the attempts by the National Trust to stop parking on the roads). The promise of a new secondary school in Tring will not be sustainable with a 50% increase in population so there are probably plans to increase the size of the town further. Additional business units will probably not be staffed by people moving into Tring so they will generate additional traffic rather than reduce as is stated in the plan.

The planning rules to only allow parking for 1.8 cars per property are clearly inadequate given that the new housing will not be close to existing facilities. Most people moving into the area will require 2 people in the household to work and their jobs will not be in Tring. This will lead to on street or more likely on pavement parking which will deter walking and cycling.

There are 2 mentions of cycle infrastructure in the vision for Tring but there is no action now and little space to put more infrastructure for bikes and pedestrians in the existing areas of Tring without taking it away from cars. I do not believe this will happen. I would love for someone to show me how it could be done. Although there is cycling infrastructure from Tring to the station this is of poor quality as it is shared with pedestrians, has an appalling surface (in spite of being resurfaced recently) and no lighting. It is poorly maintained with fallen leaves and overgrown bushes blocking the pedestrian side for most of the year. The road has huge puddles which mean that pedestrians and cyclists are constantly soaked by passing cars. I mention this as the report mentions with pride this infrastructure several times.

Pedestrian links are also mentioned twice in the 6 bullet point summary but there is little to suggest these are more than just words. Although it cannot be more than 1/2 a mile to the nearest primary school in Tring a large proportion of children travel to school by car. Because of the number of cars and no enforcement of parking regulations it has become dangerous for primary school children to cross the roads. If Dacorum were really interested in encouraging walking it would stop cars parking on pavements and on bends and provide clear sections of road to allow children to cross the road safely.

The evidence based on recent developments and current council policy suggests that far from being "an inclusive market town that meets the needs and aspirations of existing and new residents and visitors" it will become suburban sprawl indistinguishable from any other town expanded beyond the capacity of its infrastructure.

This plan will kill the town that the residents and I love.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS456

**Person ID** 1260562

**Full Name** DAVID WILDE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** There is insufficient emphasis on actions to bring on a low carbon society and combat climate change.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS475

**Person ID** 1141491

**Full Name** Mr John Whiteman

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** I have read and support the submission from the One Voice Alliance.

The scale of the proposed development is unsupported, both in general and specifically for Tring. It is unnecessary and disproportionate and will destroy Tring as a market town. While the plan is very precise regarding the number of new homes it is unacceptably vague about all the supporting policies and infrastructure. The plan is essentially led by opportunites for developers, not the interests of Dacorum residents and the council's voters.

The timing of this plan is wrong, as it becomes clear that the Covid pandemic is accelerating many changes in the ways that we live, work and shop. Previous assumptions about retail and transport requirements will no longer be valid but we cannot yet know what will be the situation. Planning on this scale should be paused while we live through the pandemic and then understand what permanent changes it has brought about.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS500

**Person ID** 1260803

**Full Name** Rollo Prendergast

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS535

**Person ID** 1260255

**Full Name** KTB Commercial

**Organisation**

**Agent ID** 1260252

**Agent Full Name** Peter  
Biggs

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The Vision for Dacorum's Places sets out development opportunities within a hierarchy of settlements. Significant growth is directed towards the larger settlements within the Borough, which is supported. Larger villages of Bovington, Kings Langley and Markyate are also identified for certain levels of growth promoting affordable housing and strengthen their roles within the local community. The Vision then highlights that within The Countryside and other small villages, "they will be protected from development".</p> <p>This statement suggests that no development will be allowed in small villages. At the very least it is considered that this statement needs to be more specific and refer to "inappropriate" or "harmful" development. Alternatively, a case could be made that further consideration should be given to development within small villages and how this form of valuable development could provide greater opportunities SME developers and deliver high quality developments.</p> <p>By turning its back on development within villages, the authority will significantly limit the opportunities for SMEs to provide a valuable contribution to the housing supply.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS544
<b>Person ID</b>	772477
<b>Full Name</b>	Mr. Roy Warren
<b>Organisation</b>	Planning Manager Sport England
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	Sport England is supportive of the health and well-being element of the vision as this is consistent with the NPPF (section 8) and Sport England's new strategy. In particular, the reference to encouraging and supporting an active lifestyle through the provision of open space, sport and recreation facilities is welcomed.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS550
<b>Person ID</b>	1260936
<b>Full Name</b>	Peter Hadden
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I believe that the Dacorum Plan should be based on the most recent ONS figures from 2018 which suggest a housing target for Dacorum of around 500 houses per annum half the figure in the Dacorum Plan and which would significantly reduce the need to build on Green Belt.</p> <p>I understand that DBC have challenged the total housebuilding figure provided by central government and if this challenge is successful then much of the Plan will need to be torn-up and thousands of hours of work will have been wasted. In the meantime areas of Green Belt may be unnecessarily de-classified never to return to their previous status.</p> <p>I do not believe that many of the proposals to build on Green Belt land are justified or provide the exceptional circumstances required for planning consent on Green Belt.</p> <p>I do not believe that sufficient account has been taken of the potential to build on brownfield sites and in particular the potential given the decline in bricks and mortar based retailing to re-purpose buildings and land from retail to residential in our existing town and village centres.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS567
<b>Person ID</b>	1261023
<b>Full Name</b>	Richard Brash
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<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 the proposed development. In my view, 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>It appears that the recent Government guidance on calculating housing need has been, at best, confusing. There has been significant campaigning locally and nationally against the nonsensical algorithmic method for calculating housing need. I firmly believe that housing need 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 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> <p>Furthermore, since the estimates were originally produced, no account has been taken of the changes to employment, shopping and living patterns which will almost certainly arise from or be accelerated by the pandemic, and which will result in more currently commercial and retail space becoming available for repurposing as residential.</p> <p>In trying to comply with Central Government's demands, the plan places too much emphasis on the development on Green Belt land, rather than maximising the use of brownfield sites. Of the proposed new housing, 60% is proposed on green belt land involving the loss of about 850 hectares of green belt. This is inappropriate in Dacorum, situated as it is, close to and partly in the Chilterns AONB</p> <p>If the housing projections are almost double current ONS estimates and more commercial and retail buildings become available for alternative use because of pandemic accelerated change, there will be scope for more development on brownfield sites and less need for building on the Green Belt.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS578
<b>Person ID</b>	1261006
<b>Full Name</b>	Paul Kelly

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I believe that the number of new houses in Dacorum is far to high and this rapid growth is not sustainable. Dacorum need to push back against the allocation from central government.</p> <p>Also, Dacorum should not be building on the Green Belt.</p> <p>The vision and strategy needs to be reviews taking into account the reality of changes in working practices following Covid.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS582
<b>Person ID</b>	1260922
<b>Full Name</b>	colin Lillicrap
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The house building targets set by central government are wrong for the country and especially wrong for Berkhamsted where I live. If the anticipated increase in population based on new houses for Berhamsted is exrtapolated across the south east it represents a massive shift of population from other parts of the UK to London and the south east. This contradicts the government declared policy of 'levelling up' the country. This directive from cetnral governmentt needs to be opposed by Dacorum Borough in collboration with all other local authorities. We should be concentrating building affordable homes in the poorer parts of the country to enable people to live and work there</p>

The proposal to build 1200 plus houses between Shooters Way and the A41 bypass without a major improvement to the roads should be thrown out immediately. The idea of a new school at Darrs lane beggars belief. This is a narrow single track road with no pavements. It would expose children to a level of risk that would amount to extreme negligence.

The vision I have of the plan is one of chaos, congestion and increased pollution coupled with damaging the green belt. My impression is that developers have come forward with plans to build on green belt land as that is the most profitable for them. The target set by central government is only a target and may not be appropriate for Berkhamsted. Dacorum have a responsibility to first establish what is right and sustainable for Berkhamsted before inviting proposals from developers.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS590

**Person ID**

1261122

**Full Name**

Mark Slade

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The changing nature of the way we live and work needs to be reflected in the strategy and that for the UK economic growth and regeneration. Commuting is essentially dead (look at Tring station car park) so why grow towns at the expense of areas of natural beauty when there is so much empty housing stock in other parts of the county that could be regenerated?

Great roads, great railways, everyone spread out with great technological communications links is the way forward. Double the size of Tring and you ruin the market town it is today and turn it into something else. The old people will gradually die off but anyone that can afford to will leave.

The phrase 'truly affordable new homes' is nonsense unless it comes with jobs, wealth creation and quality of life. Packing more people into smaller spaces with worse public services will not do this. As for Dacorum as a tourist destination - many parts are now, it won't be if it's one massive, poorly built housing estate.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS614
<b>Person ID</b>	1059789
<b>Full Name</b>	Mrs Alison Somek
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	The words expressed are laudable - really delivering on those words is the key, with proper consultation on detail. My main concerns are regarding protection of countryside and managing climate change. I note the statement "the character of the countryside will have been enhanced and continued to be admired and cherished". I sincerely hope this will be the case!
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS618
<b>Person ID</b>	1261183
<b>Full Name</b>	Oliver Fairfull
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

## 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**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS698

**Person ID** 1261101

**Full Name** Hannah Smith

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** The proposed level of growth in Tring is excessive and will fundamentally change the character and identity of this rural market town which is attractive, has a small community family feel and supports and enjoys wildlife with protected greenbelt. It won't be able to meet the needs and aspirations of the existing residents and visitors therefore.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS702

**Person ID** 1261251

**Full Name** Lesley Ashden

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

* Yes	
* No	
<b>Comment</b>	There has been many changes to the way people live and work due to the Coronavirus epidemic and the long term impacts are not yet known but as an HR Director I have seen a trend to intend to continue working from home, at least partially, in the long term and people are moving out of London but further afield than the easy commuter towns such as Berkhamsted where housing is cheaper. This proposal may well be premature and to build on such a large amount of Green Belt land (60%) in an AONB must not be taken lightly as once it is done there is no going back and the legislation is current and exists for a reason.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS710
<b>Person ID</b>	1261247
<b>Full Name</b>	Lawrence Grech
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
Yes / No	No
* Yes	
* No	
<b>Comment</b>	With the recent change in the focus from the National Government and the uncertainty around how the pandemic will affect working, communicating and living patterns longer term surely it makes sense to put these deeply unpopular strategic plans on hold until there is clarity about what the strategy should be.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS721
<b>Person ID</b>	1261250
<b>Full Name</b>	Christina Thompson

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The vision for Tring is for major growth in the number of homes. The growth proposed for Hemel Hempstead and Berkhamsted is roughly proportional to population although slightly lower for Berkhamsted. For Kings Langley, Bovington, Markyate and the rest of the borough the growth proposed is approximately 50% of that based on current population levels. There is no clear explanation for this in the plan. The proposals for Tring will completely change the character of this very rural town, which is surrounded by farms and farm land. If the number of new homes proposed were proportional to the population it would mean growth of 1,200 to 1,300 new homes over the next 17 years rather than the 2,731 in the plan.</p> <p>The use of farmland for the majority of the development in Tring is not environmentally sustainable. The suggestion that transport could cope with the number of new households is questionable, especially in respect of the capacity of Tring station and the trains into London, as I am assuming you based your plans on pre-covid use.</p> <p>It s also not clear how the plans fit with NHS plans for Hertfordshire.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS726
<b>Person ID</b>	211245
<b>Full Name</b>	Ms Jody Conibear
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	<p>Whilst I can see the pressure that this government is putting on all councils, I'm afraid the targets are unrealistic and the vision and strategic objectives are at odds with each other due to the housing targets themselves. I can see that Dacorum has attempted to "square the circle" but the vision and strategy are fundamentally flawed.</p> <p>I strongly object on four points:</p> <p>1) Dacorum is already HEAVILY, heavily congested, massively lacking in basic infrastructure, decent local shops, services and investment (notably healthcare/hospitals, doctors, police and council services to support a clean, sustainable and enjoyable place to live).</p> <p>2) Although environmental pledges are stated, these are totally in contradiction to the chosen locations for housing expansion and proposals to concrete huge areas of green belt and areas of outstanding natural beauty, particularly around the Berkhamstead, West Hemel Hempstead and Tring areas (in particular in Tring where the town appears to be doubling in size in an area of nationally renowned natural beauty and conservation).</p> <p>3) The plan shows no recognition of new working practices (particularly remote working) that has been hugely accelerated by the COVID situation. Why is there so much mention of proximity of housing to stations and new office space when most businesses are now looking to REDUCE their dependency on both commuting to London/other major cities and REDUCE their dependency on office space in general. This vision and strategy makes no mention of connectivity in terms of telecoms/fibre to the home or remote working in general to reduce the environmental impact of car use and travel in general.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS781
<b>Person ID</b>	1261297
<b>Full Name</b>	Matthew Buchanan
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS784
<b>Person ID</b>	1261302
<b>Full Name</b>	Robert Bailey
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I do not agree with the basis for the estimated housing need in the area.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS786
<b>Person ID</b>	1260046
<b>Full Name</b>	Jude Jackson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Since this plan was written there have been substantial changes to the way people are living and working. In December 2020 the Government announced plans to revise their housing targets, preferably downwards, to protect rural areas in the south east, as reported by the BBC on 16th December 2020. This should be addressed before plans are finalised.</p> <p>Theme 1</p> <p>Berkhamsted and Tring are very attractive market towns. Excessive development will destroy the essence of what makes these towns so special.</p>

I applaud your stance on providing homes for local people but another feature of the Covid pandemic has been that there has been a significant increase in number of people wishing to move from London (Estate agent told me that 60% of enquiries on houses were from people wanting to move out of London). What this has done has pushed up the prices out of the reach of local people and therefore how will you ensure that trying to build houses for local people will not still be out of reach as Londoners outbid local people.

#### Theme 3

If the plans go ahead there will be a 28% increase in housing across the whole area. This is unimaginable. The addition of thousands of extra people in the area will make roads (which are already over crowded) impossible. - An increase in traffic will certainly not make me happier or safer. I don't believe 'sustainable transport' will work. Most of the housing is a long way from both Berkhamsted and Tring town centres so residents in these new areas will most definitely have to travel by car to access shops, schools and other services. Infrastructure will struggle - ie doctors, schools, social services. Water supplies, which are already stretched in dry years will not be sufficient to cope with such large demands.

#### Theme 4

Unfortunately what will suffer most is our very vulnerable environment. The UK generally has one of the worst levels of bio-diversity in Western Europe and whilst you give statistics for improving your goals for carbon emissions, such large levels of destruction of what are not open spaces will have an irreversible impact on our flora and fauna.

I regularly go litter picking and our streets are disgusting. With a further increase in population this will also continue to increase.

the importance of nature has been shown to be so important over the past year - THIS is what we need to prioritise for the people of this area. Not ruining what is a beautiful part of the country so that people from outside the area are able to come in and buy up properties that local people cannot now afford.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS812
<b>Person ID</b>	1261352
<b>Full Name</b>	MR JAMES GROUT
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
<b>* Yes</b>	

* No	
<b>Comment</b>	They are planning too many houses, far more than are needed are being planned, 3,000 in Tring alone is far too large a scale. Smaller amounts will work better and there is no reason to go so excessive. As a collection of small market towns, Dacorum has character and the plan won't fit in with it.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS819
<b>Person ID</b>	863317
<b>Full Name</b>	Mr John Allan
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS824
<b>Person ID</b>	1260562
<b>Full Name</b>	DAVID WILDE
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	The objectives themselves are good but the key priorities must be to combat climate change and work for a sustainable future, because unless we do so we will have no future. I would like to see much more emphasis on these issues.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS833
<b>Person ID</b>	1145385
<b>Full Name</b>	Mr John Ebdon
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS841
<b>Person ID</b>	1261434
<b>Full Name</b>	Mrs Louise Harper
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I would like to see much more emphasis on climate change and work for a sustainable future.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS852
<b>Person ID</b>	1259318
<b>Full Name</b>	Anna Ashwell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS866
<b>Person ID</b>	1143779
<b>Full Name</b>	Ms Julia Marshall
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	Dacorum's vision is most laudable, but it will be difficult, if not impossible, to reduce reliance on motor vehicles for travelling, especially for the villages. Increased housing will put additional pressure on the roads. Public transport is too sporadic for everyday journeys.

For example, Bovingdon does not have a safe path /cycle way into Hemel Hempstead. Hempstead Road/ Box Lane is a fast, busy road, used by heavy vehicles. It will need investment in road calming and safe pedestrian & cycle paths to enable a modal shift.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS881

**Person ID**

1143022

**Full Name**

Mrs Lin Phillips

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Whilst recognising the competing demands of such a wide ranging Plan, I dispute that the development of so much green belt and green field land in Dacorum for housing can be undertaken without the deterioration of the environment, particularly the adjacent AONB areas, and without severely undermining the quality of life and character of the towns of Berkhamsted and Tring in particular.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS894

**Person ID**

1261504

**Full Name**

Nicholas Hankey

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No



<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS934
<b>Person ID</b>	1205804
<b>Full Name</b>	Mrs B. Watson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The Covid-19 pandemic could radically change what is needed and how things should be planned. It might make more sense to have less density of housing, more green space and less high rise flats without gardens. Also the need for retail and office space may change as more people may permanently work from home.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS941
<b>Person ID</b>	1205804
<b>Full Name</b>	Mrs B. Watson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I think it is wrong for the environment that it is intended that greenbelt and especially farmland should be built over. I think you should ensure that all available brownfield sites are developed first before greenbelt is touched.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS983
<b>Person ID</b>	1261611
<b>Full Name</b>	Ms Sue Hampton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>The Climate and Ecological Emergency declared by Dacorum needs to be the core and defining criterion against which all proposals are measured - not a side issue or afterthought.</p> <p>Recommendations should become demands. All new building MUST be carbon neutral by 2030, with cycling routes, trees planted and wildlife corridors. New developments in this plan should aim for zero emissions from planning, design, building and operation.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1006
<b>Person ID</b>	1261434
<b>Full Name</b>	Mrs Louise Harper
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	I would like to see much more emphasis on climate change and work for a sustainable future.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1079
<b>Person ID</b>	1261687
<b>Full Name</b>	Caroline Grout
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Not sure why this form needs to be like a BA Hons degree paper for experts in town planning. I am just humble resident of Tring and can only comment on my local area and my own opinion: see q. 5
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1084
<b>Person ID</b>	1261690
<b>Full Name</b>	Mr Trevor Putman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	This Note deals with the new Documents generally but the Plan for Tring sites TR01, 02 and 03 in particular. In my view and the vast majority of Tring residents, the Vision and Aims set out in the Foreword will NOT be attained or achieved under these proposals generally and for Tring in particular so that the proposals will be strongly resisted.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1115
<b>Person ID</b>	1144499
<b>Full Name</b>	Mr Robert Emberson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1144
<b>Person ID</b>	1261803
<b>Full Name</b>	Mr William Duling
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Comment</b>	I believe that the vision is wrong, in the sense that it is trying to grossly increase housing, and encroach on not only the countryside beloved by local residents, which is wrong in its own right, but also to breach the designated Green Belt area around Tring. Hence, I believe the the vision is wrong and definitely not in the best interests of the borough.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1151
<b>Person ID</b>	1261809
<b>Full Name</b>	Pam Ferguson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The aspirations of the council to deliver a vibrant economy , a healthy and safer Dacorum and housing for all are very worthy but I do not believe that the current plan is the correct way forward to deliver the vision . I think the proposals and the massive increase in housing will detroy the distinct character of the market towns of Tring and Berkhamsted . Northchurch should be regarded as a settlement in its own right and not be included as Berkhamsted.I think the starting point for the local plan should be the housing needs of the borough determined by using the most up to date ONS data . If this is done the housing requirement of the borough would be roughly half of that proposed . The recent government white paper said that green belt should only be developed in exceptional circumstances .I do not believe the delivery of housing numbers way above that that the most recent data demonstrates is needed qualifies as exceptional circumstances .Berkhamsted is classed as sustainable because it has some facilities eg ,station, shops etc.No account is taken of the nature of the town, its topography and its already stretched ttransport infrastructure..The vast majority of the development in the borough will be on green belt land which can only be supported in exceptional circumstances. The housing number calculation should be challenged by the council .
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1156
<b>Person ID</b>	1261830

<b>Full Name</b>	alistair budd
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Whilst the words in the vision are entirely laudable , they are not really supported nor will they be delivered by the plans being proposed .</p> <p>Are the plans based on sound judgements about population requirements . Particularly when one would hope to see an econmic rebalancing towards the rest of the country ,as we become less London centric . The fundamental assumptions need to be revisited .</p> <p>This revaulation is also needed in the light of the pandemic and Brexit . Both these events will certainly have implications for housing and the way our economy works .For example the pandemic has fundamentally changed how we shop . The ' high street ' needs to be reimaged ,as does the supply of office accomodation . Both these create new opportunities for housing on existing sites which can be repurposed .</p> <p>These are impacts at a macro level that disconnect the strategy goals from the actual plans . At a plan level it is clear that Berkhamsted and Tring for example willl no longer be market towns retaining their small town character . This should be be clearly recognised in an open honest way to show a clear intent . Rather than as now it might be thought of as just an unintended consequence .</p> <p>Whilst down at a site level there appears to be serious disconnect with the vision. Talking about cycling and walking is excellent . But not when your major deveopments in Berkhamsted are on the top of a ridge with the town in the valley . Even regular cyclists struggle coming up the valley side .</p> <p>I would urge the planning and council authorities to critically examine each site plan and whether it meets the the requirements of the wider strategy once that in itself has been properly reviewed .</p> <p>We need more homes and authorities have a very difficult job . But it is very easy to see the planning follies and also successes that are evident across the borough .Please learn from these and build on past successes.</p> <p>Will future generations look back at these plans and praise the wisdom and foresight of those who put them in place . Or despair at the urban blight , traffic , poor infrastructure , the views of concrete and brick ,and the diminished natural environment .</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1158
<b>Person ID</b>	1261837
<b>Full Name</b>	Kimberley Bond
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>A quote from the text - "Growth will have been accompanied by supporting services and infrastructure which were delivered at the right time and benefited new and existing communities, particularly transportation, education and open spaces, to have created healthy and sustainable developments.". I do not believe, the local plan, as set out, achieves this. The supporting services and infrastructure for several of the smaller developments on brownfield sites, as well as some of the larger developments do not take into account the core foundations of residence that plague even existing communities - such as stretched local services such as GPs, a lack of parking in most residential areas and simple factors such as utilities and drainage. The volume of roadworks to support existing utilities grinds the area to a halt on a regular basis and will be exacerbated not just by the proposed scale of the developments during the build phase, but through the sheer strain on underlying infrastructure continue to damage the 'lived experience' of Dacorum for years after.</p> <p>"having facilitated a significant increase in sustainable travel modes" - how exactly? The proposed plan includes very little development by way of jobs to support a significantly increased population in Dacorum. Sustainable travel through an electrified rail network or electric buses, enhanced cycle ways etc still requires significant travel for work and despite best efforts will likely see a population who choses to maintain and travel by car - noting one of the selling points of the area is it's proximity to the M25, M4 and M1. Even an abundance of electric vehicles cannot be supported through Victorian streets with incredibly limited off street parking - and in some instances significantly congested on-street parking where the likelihood of getting a space near enough to your house to utilise any electric charging points for vehicles, will likely see the area have a significantly lower uptake on electric vehicles for personal use than many others. Youe 'Economic Growth' section seems to rely on the proximety of the M1-M25-A41, thus accepting that a signficiant proportion of additional traffic will be required to deliver even the marginal economic growth likely to be delivered by an 'Innovation Quarter'. I hope someone sees the irony in this and the link to the Enviro-Tech centre, and the lack of coherency across</p>

your plans to deliver sustainable travel whilst equally relying on a road network, with little available access to residential parking let alone electric charging points for vehicles.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS1163

**Person ID** 1261840

**Full Name** Rachel Heath

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

No

**Comment** In principle the strategic objectives are sound but the reality will not match them if as per the proposals there is an excess of new housing without the infrastructure, which intrudes on the green belt, exceeds development by 114% from the core strategy and is unlikely to be inclusive on local development's past track record. It also seems to go against national planning policy and I have not been able to find any exceptional circumstances to warrant the excessive development in an area which includes an AONB and historic buildings.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS1183

**Person ID** 1261851

**Full Name** Norman Groves

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

No

* Yes	
* No	
<b>Comment</b>	<p>Far too many houses are put forward as the "correct" level for building targets, given the doubts over the real requirements. The impact on the environment of the Green Belt and existing settlements it is meant to enhance, will be suddenly damaging, dramatically tragic and totally irreversible.</p> <p>Starting from a premise that is suspect and therefore contentious, the overarching Vision is questionable; the prospective high build rate will adversely impact the principal urban centers and especially the unwarranted loss of swathes of Green Belt, including around Berkhamsted/Northchurch, that are designated in the Draft Local Plan as 'Growth Areas'.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1200
<b>Person ID</b>	1261875
<b>Full Name</b>	Fiona Silver
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
Yes / No	No
* Yes	
* No	
<b>Comment</b>	<p>There are many fine sentiments expressed in this section, but this is not what this plan is about. It's about building lots of new houses, primarily on Green Belt land, to meet a supposed government target, which the government has made very clear is not a target and should not be used as a reason to destroy the Green Belt. They said in December 2020 "We should be clear that meeting housing needs is never a reason to cause unacceptable harm to such places." I am at a genuine loss to understand why DBC is not pushing back to explain that the kind of new housing numbers suggested for Dacorum are unachievable without destroying precious countryside that will never be recovered.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1203
<b>Person ID</b>	1142889

<b>Full Name</b>	Dr Peter Chapman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Tring's population will grow considerably and together with anticipated tourism will cause much congestion on its narrow roads., which are a legacy of its old market town origins
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1228
<b>Person ID</b>	1259116
<b>Full Name</b>	Tring in Transition (TinT)
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p><b>There are several notable and important gaps that require formal and explicit inclusion.</b></p> <p>In the comments below we give considerable evidence to indicate that the proposals for Tring are <i>not compliant with the Plan's own stated strategic objectives</i> – even if dwelling growth numbers are significantly reduced. We acknowledge that (as per section 1.12, Page 6) we are not reviewing a final Plan, nonetheless there are many points that must be addressed in those sections that are more advanced in their evolution:</p> <p><b>Section 1.30 'Working with Others' (Page 9)</b></p> <ul style="list-style-type: none"> <li>This section notes the importance of cross-boundary matters. For Tring, bounded on <i>two</i> sides by Buckinghamshire, the plans of that county have a significant bearing on employment, traffic, local land use etc. In the Plan, we can</li> </ul>

find no reference to Aylesbury Vale District Council or Buckinghamshire, and few to local villages in that county, contrary to NPPF para 35c. This is a concern and may have led to what we feel are flawed conclusions on matters ranging from employment to the siting of additional retail (see detailed response to later questions) and (importantly) the number of houses for the immediate area.

### **Section 2.1 ‘Opportunities of Growth’ (Page 14)**

- It should be explicit here (and reflected in all other relevant sections) how the Plan will meet new Environmental Sustainability challenges formalised during the latter part of 2020, including the revised Sustainable Hertfordshire Strategy (and associated targets) and the priorities defined by the Hertfordshire Climate Change and Sustainability Partnership (HCCSP). These go far beyond references to this topic on page 22.

### **Section 2.2 ‘Climate Change’ (Page 9)**

- *‘A central thread of the Local Plan is to plan for a low-carbon future in which carbon emissions and other greenhouse gases are reduced.’* This is a welcome statement; however, we feel an opportunity is being missed to take a more robust stand, for example by referencing DBC’s Climate Emergency Declaration and zero carbon target of 2030. Other authorities, for example, have already mandated inclusion of solar energy capture (thermal or PV) in new builds, community renewable energy schemes, tough building standards and more. Given that we are planning for a mid-21st-century environment we believe Dacorum should also take a more robust and mandated approach.

### **Section 2.12 ‘Vibrancy of Town Centre’ (Page 15)**

- *‘We do not believe [there will be] a significant requirement for new [Retail] floorspace over the lifetime of the Plan.’* We broadly agree with this, especially given the higher percentage of empty retail space in Tring High Street compared to (at least ) Berkhamstead – however, Tring has long retained a market feel and there are opportunities to make changes to support a much larger, vibrant, ‘destination’ market space (see also our comments on Delivery Strategy).

### **Section 2.19 ‘Natural Environment’ (Page 16)**

- We strongly support this intention – and would like to see more instances of this aspect of the strategy made explicit elsewhere in the Plan.

### **‘Local Distinctiveness’**

- There are over 20 references to the importance of local distinctiveness in the Plan, e.g., page 22: *‘All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.’* We strongly support this position but are concerned that there are no references to what makes Tring distinctive, or to a process by which that will be agreed and at what stage it will become binding on this LP.

We strongly feel that this needs to be formally addressed. Placed at an important ancient crossroads, Tring’s market heritage is deeply rooted, it has a track record of many ‘firsts’ including clean water supply, land set aside for public

amenity and nature conservation and water and wind-based energy generation and is also located in the midst of more SSSIs and officially designated natural beauty than other locations in Dacorum.  
See our more detailed comments on this point in our response to Question 9: 'Do you have other comments on the plan?'.

**'Vision for Dacorum's Places' for Tring (Pages 22, 23)**

- At such a high level it is difficult to comment. It would be good to see a version of this with five or six explicit and detailed bullet points on the key means to achieve this, reflecting local knowledge. For example:
- How will the viability of Tring as a market town be maintained with such an increased population and associated pressure on a town centre that will have to accommodate more traffic?
- How can sensitive views and landscape be maintained? (See later comments – Q9 – on this).
- There is not yet a joined-up cycle and footpath plan for Tring and there are gaps where this extends beyond residential or connecting streets.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1253
<b>Person ID</b>	1253932
<b>Full Name</b>	Gareth Scrivens
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<b>The current plans do not do this.</b>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1259

<b>Person ID</b>	1253872
<b>Full Name</b>	Georgia Huelamo
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I don't support this Local Plan.</p> <p>The housing target is based on incorrect, superficial and out of date data(based on 2014 ONS data). The change of formula has increased the housing target and is unrealistic for this area. The vision should be adapted to consider sensible and intelligent housing numbers that reflect the Dacorum of today and of the future. The housing numbers being proposed for Dacorum will change the character of our market towns, greatly impact on surrounding wildlife and destroy AONB vistas and valuable greenbelt land. It will remove working tenant farms and by this will impact heavily on individual livelihoods (Tring) and reduce the opportunity for our children to gain employment in these farms.</p> <p>Already, there have been significant societal changes which have impacted on our current and prospective population growth; how we live and function as a community; the use of retail and commercial property; and what is now more valuable and urgent in terms of our environment against a backdrop of climate change.</p> <p>I don't feel this overarching vision takes these matters fully into account for Dacorum and seeks to avoid these facts, basing its strategy around the housing numbers which are not sensible nor logical.</p> <p>There will be significant issues which will impact on the health and wellbeing of current and future Dacorum communities, should these housing numbers go ahead.</p> <p>One such example (there are many), is that the housing target does not compute with the level of local employment opportunities and will force communities to travel further afield for work. This in turn will increase and maximise capacity on roads and transport links which are already stretched, given the large scale developments further afield (Aylesbury et al) which have also impacted on the train lines into major cities (London &amp; Birmingham).</p> <p>The vision and objectives, also sets out to compromise heritage landscapes and greenbelt land and is limited in its consideration of climate change. Its very apparent that the out of date housing numbers will negatively impact carbon emission targets and 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).</p>

It is also concerning that the vision does not go so far as to give assurances or guarantees as to any targets for housing developers in consideration of construction waste disposal/recycling and reuse of materials; quality of housing in line with Dacorum's climate change policies; sensitive consideration and care of ancient hedgerows; rare habitats; tree and woodland preservations; increases in housing garden space; quantity of community spaces, in particular allotments and wild spaces; creation of further wildlife habitats and nature sites to offset of use of land for development.

The plan does not consider enough, the amount of alternative urban/brownfield sites currently available for change of use or residential development. There is significant amount of commercial and retail property available, car parks & public houses; garages and urban/brownfield land which should be considered first, before greenbelt land.

I dont believe this vision nor strategy considers these points in any detail and uses technical terms and greenwashing to avoid consideration.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1260
<b>Person ID</b>	1261930
<b>Full Name</b>	Chris Gee
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The development plans for Dacorum seem overly ambitious given the recent Covid pandemic has caused a shift in home working and decreased mobility; there is now no sound argument for the significant dwelling capacity required, focused in the south east of the country.</p> <p>This is coupled to the Govt imperative to redress the economy and increase the infrastructure development and wider community opportunities in other parts of the country.</p> <p>There needs to be a collective pause and re-consideration of these housing &amp; infrastructure requirements, both nationally and at local govt levels.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS1272
<b>Person ID</b>	1145427
<b>Full Name</b>	Mr David Glenister
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I do not agree with 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth is simply too much for the town – with circa 500 dwellings planned in Northchurch Parish and around 1700 in Berkhamsted, it equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint (Google Earth used for calculations), most of which is located within sensitive ridge top locations in Green Belt. I note that the 2013 Core Strategy vision of “maintaining the strong valley and linear character of the settlement” has been dropped from the new Local Plan. Where previously the Council asserted that “The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported” (and put this argument strongly to the Planning Inspector), DBC now promote the land for removal from Green Belt and suggests that development can now be built “in a way that takes account of sensitive views and landscape”. I strongly disagree with this position and believe the 2013 vision should be re-instated.</p> <p>Siting developments at a distance (3-4km) from the town centre at the top of a significant hill does not make sense. People will have to use their cars to get to the station and park for shopping in the centre. People need accessible town walk which are accessible. South Berkhamsted provides for this admirably and provide a local green areas to keep the local resident fit and healthy in the open spaces.</p> <p>I find it very concerning that Dacorum Planning have completely shifted the Council's position from one of planning within the constraints of the Borough, with the wellbeing of current and future residents in mind along with protecting the unique and historic assets of the two market towns and their environments, to a position that makes no attempt to protect valuable assets of the Borough including large areas of Green Belt. It appear that Dacorum is no longer wishing to be the custodians to preserve the market towns and the surrounding countryside which have been carefully protected (eg Local Community of Berkhamsted Resistance to Lord Brownlow attempt remove Common Land that is now known as Berkhamsted Common) over many generations since 1066. This is not acceptable and should not be allowed to happen The current Dacorum Borough Council position seems to be also in direct conflict with Central Government Policy on Green Belt;</p> <p>Here are 6 examples</p>

1) The NPPF provides protection for Green Belt and the land due to be released around Berkhamsted clearly pass the tests. 2) In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming “demand for housing alone will not change Green Belt boundaries”. 3) Paragraph 9 of the 2017 DCLG “Planning for the right homes in the right places: consultation proposals” 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.” 4) On December 16th 2020 the Government published a response to the recent white paper consultations. With reference to protected landscapes and Green Belt it states “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.” 5) The same response goes on to state “We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.” 6) And further clarifies “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 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.” The 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the Dacorum Borough Vision in this plan fails to reflect any of this.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1308
<b>Person ID</b>	1261975
<b>Full Name</b>	John King
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	

<b>Comment</b>	ignores the inherent individuality of the major towns and their respective and individual identities which in the case of Tring will be destroyed
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1321
<b>Person ID</b>	1145350
<b>Full Name</b>	Mr Edward Murray
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The objective assumes a growing population and the requirement for it to be housed on green field sites.</p> <p>It does adequately address the consequences of covid and brexit. Brexit has shrunk the UK population whilst covid has accelerated the decline in need for retail space.</p> <p>This retail space should be converted for housing. Not green field sites.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1358
<b>Person ID</b>	1262046
<b>Full Name</b>	Mr Richard Abraham
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	With the vast number of developments planned it is difficult to see how the vision of creating a 'vibrant economy' and also protecting the natural and historic environment could actually be achieved. Crowding housing onto green belt town fringes and overfilling the small market towns of Berkhamsted and Tring would appear to fly in the face of this vision.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1374
<b>Person ID</b>	1262050
<b>Full Name</b>	Mr Martin Parr
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<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. 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.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1465
<b>Person ID</b>	1262092
<b>Full Name</b>	Elly Haezewindt
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I have significant concerns about Dacorum's proposed Local Plan, titled "Emerging Strategy for Growth 2020-2038". 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. This is the equivalent of 1,214 football pitches, and would cause irreparable harm to the environment. We believe the Council's growth strategy fails to address the climate emergency and the impact on infrastructure, and underestimates the potential to provide housing on existing developed sites. Green Belt land is threatened at Berkhamsted, Tring, Hemel Hempstead, Kings Langley, Bovingdon and Markyat
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1483
<b>Person ID</b>	1262027
<b>Full Name</b>	Wilfried Bernard
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	<p>I write in respect of the housing over development proposed in this plan in Hemel Hempstead and in the Dacorum area and in particular building over green belt where better suited brownfield sites and affordable housing are needed in the Midlands &amp; North and not so much in the Home Counties in and around London.</p> <p>Also the calculation used old data from 2014 ONS rather than the more recent 2018 ONS data.</p> <p>The effect of the plan on our greenspaces is devastating. All of that greenbelt and other farmland that will be lost to these developments. Not to mention the effect on air pollution of the added traffic.</p> <p>I appreciate the need for more housing, but there are many brownfield sites that can be developed. I appreciate the fact that Dacorum has become a desirable place to live, but I seriously doubt these plans will do anything other than to line the pockets of developers &amp; DBC - who despite the well intentioned statements in plans such as yours, will not provide affordable housing for those that need it.</p> <p>These developments will affect the quality of life of people who were born, or have moved to the area in an attempt to get away from traffic, pollution and have access to our wonderful countryside.</p> <p>The impact of Covid has changed the way those dormitory towns have now places where people will WFH, enjoy and spend a lot more time without having to commute into London anymore for most local people.</p> <p>England is a green a pleasant land. Please keep it this way.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1489
<b>Person ID</b>	1262216
<b>Full Name</b>	George Godar
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The target of c.17,000 new homes over the Local Plan period is excessive when compared with Dacorum BC's previous estimates of what is required as well as with ONS estimates. Furthermore the target and the distribution of where housing sites will be available has been overtaken by the effects of the Covid-19 pandemic in terms of changes to commuting, shopping and other living patterns, as well as office and retail sites which might become available for housing within

urban areas. This will enable a more intensive use of brownfield sites for housing to the benefit of the Green Belt and the Rural Area.

The use of some 850 hectares of Green Belt is inappropriate having regard to the proximity of areas allocated for housing to the Chilterns AONB.

Dacorum BC should make use of exceptions to the target housing figures if meeting the target adversely impacts the Green Belt and the Chilterns AONB.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS1527

**Person ID**

217987

**Full Name**

Mr Chris Watson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

The Covid-19 pandemic could radically change what is needed and how things should be planned. It might make more sense to have housing with private gardens and space for working at home and less high rise flats without gardens.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS1528

**Person ID**

217987

**Full Name**

Mr Chris Watson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Comment</b>	Also the need for retail and office space may change as more people may permanently work from home.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1529
<b>Person ID</b>	217987
<b>Full Name</b>	Mr Chris Watson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Comment</b>	I think it is wrong for the environment that it is intended that greenbelt and especially farmland should be built over. Consideration should be taken of the increased demand for locally grown food and changes to agriculture now we are no longer tied to the Common Agriculture Project of the EU. I think you should ensure that all available brownfield sites are developed first before any greenbelt is touched.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1579
<b>Person ID</b>	1262282
<b>Full Name</b>	Lisa Rowe
<b>Organisation</b>	
<b>Agent ID</b>	1262276
<b>Agent Full Name</b>	Giulia Bunting

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<b>The Vision for Dacorum's Places</b> Berkhamsted provides opportunity to play a role in delivering growth within the borough. New neighbourhoods can be delivered to the south - BFI considers the comprehensive nature of the delivery of these sites needs further consideration to enable individual sites to be delivered independently over time.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1589
<b>Person ID</b>	1149465
<b>Full Name</b>	David Reavell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1603
<b>Person ID</b>	1261385
<b>Full Name</b>	stephen hearn
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><b>Growth area TR06 – off Brook Street Tring</b></p> <p>TR06 comprises Tring Market Auctions, The Tring Local History Museum, the Fire Station and Forge Car Park.</p> <p><b>Tring Market Auctions</b> 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 &amp; 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>

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

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#### 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**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS1627

**Person ID**

1262323

**Full Name**

Emma Hilder

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Too much green belt being used. Over developing Markyate. It will cause increased congestion on the A5 and the M1 which will effect the environment.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1667
<b>Person ID</b>	1262336
<b>Full Name</b>	Mrs Sue Rivers-Brown
<b>Organisation</b>	Rothschild House Group
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1671
<b>Person ID</b>	1261232
<b>Full Name</b>	Mark Burrage
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<b>Overarching Vision for Dacorum's Growth by 2038</b> The vision is week on sustainability. Inclusion of a zero carbon target along with a focus on a regenerative economy seeking to enhance our natural environment is necessary. We have huge potential within the Green Belt area to provide more environmental services and should not rest merely on openness.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1687
<b>Person ID</b>	1165136
<b>Full Name</b>	Mr & Mrs J.D Battye
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Once again we have a plan full of “vision” (SP 21/22) and yet present and future reality is/will be somewhat different. While it is laudable to aspire, experience suggests such aspirations will not be delivered. We have just looked back at our submissions for the 2017 consultation; they are depressingly similar to our present comments, indicating how little progress has been made in the interim, particularly with regard to infrastructure and biodiversity.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1706
<b>Person ID</b>	1149470
<b>Full Name</b>	Mrs Fiona Reavell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	No
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1720
<b>Person ID</b>	223955
<b>Full Name</b>	Mrs Christine Widdows Doughty
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p><b>ENVIRONMENT:</b></p> <p>The Local Plan Vision + Objectives include the following:</p> <ul style="list-style-type: none"> <li>Mitigating + adapting to Climate Change</li> <li>Protecting + conserving the natural environment</li> <li>Promoting community health, well being + cohesion</li> </ul> <p>The Local Plan admits that “<i>development in the Green Belt is strictly controlled</i>” and can only be done in “<i>exceptional circumstances</i>”. I disagree that current circumstances are exceptional enough to require any development on the Green Belt in Dacorum, and particularly to the extent proposed by this Local Plan for Berkhamsted.</p> <p>Building on the Green Belt does not fulfil the above Vision and Objectives.</p> <p>The Covid-19 Pandemic has shown the importance of nature and the countryside. Building on the Green Belt robs people of the benefits of nature as promoted by the government as vital for health and well-being.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1721
<b>Person ID</b>	223955
<b>Full Name</b>	Mrs Christine Widdows Doughty

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>The Local Plan proposes delivering a "network of green spaces" [23.131]. This already exists in the form of the Green Belt.</p> <p>The green field sites between Berkhamsted and the A41 By Pass act as lungs for the town, providing a buffer between the town and the traffic, noise and pollutions of an increasingly busy road. Building on these sites would only increase noise and air pollution for the whole town.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1723
<b>Person ID</b>	223955
<b>Full Name</b>	Mrs Christine Widdows Doughty
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>I understand from the Council for the Protections of Rural England (CPRE) Hertfordshire, that DBC has a duty to protect the Chilterns Area of Outstanding Natural Beauty (AONB). This includes considering the impact that development of surrounding areas would have on the Chilterns AONB. It is highly likely that building houses right up to the boundaries of the Chilterns AONB would be detrimental to that area in terms of light, noise and traffic pollution, and general disturbance.</p> <p>I also understand that the Chilterns Beechwoods Special Area for Conservation (SAC) could also be badly affected by proposed developments in the Local Plan, in contradiction of its own stated objectives.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1733
<b>Person ID</b>	1153984
<b>Full Name</b>	Elizabeth Rennie
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Section 3. Borough Vision.</p> <p>The vision is worthy but in reality unobtainable because neither the environmental or the natural resources are protected. The impact of 5954 new homes on Green Belt land ignores National Planning Policy, as Government ministers and the Prime Minister have stated that only in exceptional circumstances should Green Belt be developed. There are no exceptional circumstances for Dacorum's plans and certainly if built they cannot be said to be protecting the environment and natural resources.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1738
<b>Person ID</b>	1261812
<b>Full Name</b>	Harvey Collyer
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

<b>* No</b>	
<b>Comment</b>	<i>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”.</i>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1760
<b>Person ID</b>	406469
<b>Full Name</b>	Dr Stephen Douglas
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> <b>* Yes</b> <b>* No</b>	Yes
<b>Comment</b>	Over development. Too many houses
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1801
<b>Person ID</b>	1262358
<b>Full Name</b>	Jennifer Scott
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

\* Yes  
\* No

**Comment**

I believe the proposed growth is too much for Berkhamsted (where I live) and Tring. With around 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, it is a 24% increase in dwellings and a massive 31% growth of the urban footprint (Google Earth used for calculations), most of which is located within sensitive ridge top locations in Green Belt.

The 2013 Core Strategy vision of “maintaining the strong valley and linear character of the settlement” has been dropped for the new Local Plan. Why has this been done when these are the key characteristics of Berkhamsted? The Council once said that “The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported”, DBC now promote the land for removal from Green Belt and suggests that

development can now be built “in a way that takes account of sensitive views and landscape”.

I appreciate the vision to provide “significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town”, however most of the developments are located on higher ground and located away from the town centre and train station. I currently live at the top of Swing Gate Lane and can confirm that while I walk my children to school and I walk into town for a coffee - I have to drive to town if I am visiting the supermarket or looking to buy sizeable items. I also drive to town if I am short on time which is often the case! I have lived on Swing Gate Lane for 10 years and I can only just manage to cycle to my house at the top of the road. The sites included are located even higher than my house- there is no way people and families will be cycling to and from town. Young children will not be able to walk and parents will struggle as I did to push a buggy up the hill. There is simply no avoiding the fact that there will be a huge increase in vehicle traffic around town.

Many families do you use the footpaths at the top of Hall Park / Swing Gate Lane and they provide a fantastic space and sense of release. The local plan seeks to remove many of these areas that have been used by the community to access the wider countryside.

Berkhamsted doesn't have the road infrastructure to cope with the extra traffic, nor is there the ability to provide it given the historic built nature of the town.

Berkhamsted is a special place to live - somewhere I feel fortunate to live. The Draft Plan does not seek to preserve what makes Berkhamsted special or focus on the well being of current residents. The Green Belt land around Berkhamsted is used for recreation but also provides a sense of space and freedom from residents windows. This will be a huge loss.

The draft plan references an "exceptional circumstances" exist that requires the

removal of Green Belt. I DO NOT agree with this statement. The target is still under debate and should not be used as justification to lose Green Belt land forever. A target does not mean that the level of housing is correct and justified for a specific area. The required number of homes cannot be built without massive detrimental impact on Berkhamsted and Tring.

The target set by central government should not just be adhered to without question by the local council. The Government has made it clear that the numbers are a starting point only and it is up to Local Authorities to know if local constraints such as Green Belt means that the numbers cannot be delivered.

There are many examples that could be used, but BRAG - of which I am a member has limited itself to highlighting just six examples of guidance issued by Government that shows the policy on Green Belt protection is clear and unambiguous:

- 1) The NPPF provides protection for Green Belt and the land due to be released around Berkhamsted clearly pass the tests.
- 2) In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming “demand for housing alone will not change Green Belt boundaries”.
- 3) Paragraph 9 of the 2017 DCLG “Planning for the right homes in the right places: consultation proposals” 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.”
- 4) On December 16th 2020 the Government published a response to the recent white paper consultations. With reference to protected landscapes and Green Belt it states “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”
- 5) The same response goes on to state “We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.”
- 6) And further clarifies “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 Berkhamsted Residents Action Group (BRAG) Draft Response to DBC Draft Local Plan Consultation 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’s sole justification for accepting Government’s numbers (922dpa) as a strict target is simply that “Any option below the standard methodology would have to be robustly justified” (paragraph 5.8 of The Development Strategy Background Topic Paper).

Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, BRAG fails to understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified”.

Indeed, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the new retrofit Borough Vision fails to reflect any of this.

‘The Vision for Dacorum’s Places’ for Hemel Hempstead is similarly confusing. The vision leads with “The Hemel Garden Communities programme will be delivering new homes, green spaces, green businesses, and community facilities and is a catalyst for transforming Hemel Hempstead and taking forward the legacy of the New Town”.

But the bulk of the dwellings that make up the Hemel Garden Communities initiative are being held back to be delivered after the Plan timescale. So, it is difficult to understand how they are going to contribute to a ‘vision’ for the town over the plan timescale when the land is to be ‘safeguarded’ over that period.

Most of this land is Green Belt and, as stated above, the Government numbers do not constitute the exceptional circumstances required take the land out of Green Belt. But then as the bulk of the development is after the Plan period and doesn’t form part of the allocation to meet the ‘targets’, DBC clearly have other exceptional circumstances for removing the Green Belt status, but those circumstances are not evident in this Plan.

DBC are receiving funding from Government to help develop the Garden Communities program and BRAG understands that the Garden Communities project is in fact a joint initiative with St Albans. Any cross-boundary initiatives can be complicated, but if the ‘exceptional circumstances’ required to change the land designation is the chance to transform Hemel Hempstead, then DBC have completely missed the opportunity to provide a truly bold regenerating vision for the Dacorum’s main town.

In truth, these plans simply lay the foundation to tack on new housing estates long past the Plan period that fail to rejuvenate Hemel Hempstead and in the meantime destroy the historic character and setting of Berkhamsted and Tring.

In the context of the Local Plan out for consultation the visions outlined are far removed from reality. To garner support they should stand a realistic chance of being achievable. So, in summary, it is my opinion that as currently presented the draft Plan is unsound and would not pass Public Examination.

I firmly believe it is the wrong future for Berkhamsted and one that would irrevocably damage the nature of the town.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS1826

**Person ID** 1262446

**Full Name** Mr Andrew Boothby

**Organisation**

**Agent ID** 1175743

**Agent Full Name** Kevin  
Rolfe

**Agent Organisation** Group Director, Development & Planning  
Aitchison Raffety

**Yes / No** Yes

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS1842

**Person ID** 1262473

**Full Name** Mr William Tannett

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>Comment</b>	<p>Thank you for the opportunity to comment on what is a huge amount of hard work. I lack the skill to comment on some detailed aspects, but in regard to the 'overarching vision':-</p> <p>This is said to be a 'central government requirement' but our part of the South East is already severely overcrowded. If seeking to build so many new homes in such profusion - and that case is not clearly made in my view - such dwellings should be towards the north of the country as part of the levelling up agenda. I query if the numbers have been foisted on us as your very detailed plans show virtually every possible remaining space in my area of Berkhamsted is to be built on.</p> <p>Dacorum is already virtually 'full' and we have yet to see the impact of the pandemic on the way we shall live in future.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1861
<b>Person ID</b>	1262481
<b>Full Name</b>	Madeleine Donohue
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Problem is that strategy developed before pandemic. Borough needs to completely revisit the position of the high street and office space within town centres. Will this space still be needed? Could it become housing instead of using green field sites? What is the future of the high street in our on line world?</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1869
<b>Person ID</b>	1262495
<b>Full Name</b>	Jason Nell
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The vision includes way too many houses and the development on greenbelt land is absolutely outrageous.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1885
<b>Person ID</b>	1262518
<b>Full Name</b>	Rachel Kempster
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1890
<b>Person ID</b>	1262291
<b>Full Name</b>	Paula Farnham
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The vision and objectives seem to contradict one another. How can the borough be more environmentally sustainable while giving up a significant amount of the green belt for housing, which will encourage more car journeys? How can the loss of 2,000 acres of green and open space deliver on the vision of being a 'commercial hub', new link roads, new neighbourhoods etc etc.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1905
<b>Person ID</b>	1262553
<b>Full Name</b>	Henry Wallis
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>I believe that there are a number of significant macro-economic factors that will significantly impact the plan in the next 5 years or so, that have not been factored in sufficiently. These changes may well significantly impact the amount of green belt land that is needed for the houses planned in this Plan - and once green belt land is de-classified as such it will not be re-classified if no longer needed for housing, in say 5 years time.</p> <p>The factors are:</p> <ul style="list-style-type: none"> <li>- Brexit - the population in UK is already showing net-emigration in the last year</li> <li>- Powerhouse North/levelling up UK - if the Government wants to "level up the UK" and create more opportunities in the North, why so many houses need to be built in the South?</li> <li>- Covid-19 - the impact of Covid-19 on future working patterns is not yet fully known but it is clear that more people will work from home in the future. This will result in less office space being needed, providing more opportunities for conversion to housing.</li> </ul>

Looking at the Strategic Plan 2050 why do we have to keep growing Dacorum, especially as it is recognised that a high %age of Dacorum is AONB/green best? Why can we not "just" seek to take advantage of the exisiting spaces (brownfield etc etc) available for expansion to business or housing, and then leave it at that?

The plan should allow for flexibility to allow the Council to see the impact of the above and adjust the plan accordingly, while it is still possible.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS1936

**Person ID** 1262244

**Full Name** Estelle Wraight

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

**Comment** The numbers are wrong and based on a mutant algorithm that has since been ditched. This consultation is done at the worse possible time of a national lockdown and local residents without internet access do not have a say.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS1946

**Person ID** 1262255

**Full Name** AJ W

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

* Yes	
* No	
<b>Comment</b>	Growth for Berkhamsted & Tring are not (as suggested) sustainable or tenable. A 24% increase in housing in Berkhamsted is unreasonable and not required (but a target) by the government. There is no necessity for most of this development to come from greenbelt land, and the requirement for building on this sensitive area can in no way be 'robustly justified' furthermore there are no 'exceptional circumstances' that mean that this is a viable option. The plans appear to totally overlook the opportunity to reinvigorate the failing town of Hemel while ruining the Market Town character of both Berkhamsted and Tring. Why the vision has shifted so far from the 2013 core strategy of maintaining the town character of Berkhamsted and Tring is without comprehension.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1952
<b>Person ID</b>	1262601
<b>Full Name</b>	Anne Smith
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	<p>Having lived in Dacorum most of my life in Tring, Hemel and Northchurch, there are some good elements. Hemel Hempstead does present the opportunity for economic growth and it is good to see the focus.</p> <p>My concerns are that Northchurch has been identified as West Berkhamsted when it is a village in its own right, with fabulous views over the Chilterns (AONB) and a gateway to the National Trust Forest of Ashridge. The vision identifies villages should be protected from development and support the rural community, and the countryside pursuits so important now for mental health and a happier and healthier community but this has not been the case for Northchurch.</p> <p>The vision muddies the urban with the rural.</p> <p>The vision prioritises meeting an excessive level of housing over the protection of Green Belt, this is contrary to national policy, DBC's own policy and both the Chiltern Conservation Board Management Plan 2019 - 24 and its Position Statement Development Affecting the Setting of the Chilterns AONB (2011, revised 2014). Although it states that a key objective</p>

is "minimising and managing the requirement for the development on Green belt land and on the impact on the Chilterns AONB, this is clearly not the case.

The strategic plan has not taken into consideration the CCB Management plan 2018-2024 which says a development outside the AONB boundary can cause to the AONB even if it is some distance away; a particular example is the Northchurch proposals.

Dacorum's numbers are clearly wrong and with Brexit and the pandemic there is already significant signs of further retrenchment in the economy and housing need.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS1953

**Person ID**

1262604

**Full Name**

Ray Smith

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

3.5 This is growth for growth's sake imposed by a Borough out of touch with local communities. These fine aspirations, such as protecting the countryside, health and well-being of existing residents etc., are contradicted by the plans laid out below. If existing developments such as Bearoc Parc go ahead without proper drainage installed and reduced biodiversity, there is every reason to think this plan will result in reduced quality of life.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS1954

**Person ID**

1262618

**Full Name**

Jasmine Jenkins

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Affordable housing is a key need but this will not be poaible in Dacorum even for those families with 2 average salaries let along those with the median wages or below with average house prices nearly £500,000</p> <p>The environmental objectives cant be met when so much green belt will have to be used</p> <p>The towns cannot be 'enjoyable' with huge population increases when they are snarled up with traffic and less likely to be clean and safe</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS1956
<b>Person ID</b>	1262647
<b>Full Name</b>	Carolyn Wallis
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The overall level of growth is too high and will cause too great an impact on the borough, changing it's nature and destroying areas of countryside for ever. We all accept that we need more houses, enough for current residents and their families and future families, but the plans indicate establishing whole new areas with increased employment and industries which will bring more people from outside the area. While we are told that these housing figures are imposed by the government, what steps have the council taken (on behalf of their residents) to contest these number? Your documents make clear that 85% of the borough is countryside, including Green belt land, areas of Outstanding Natural Beauty and internationally important beech woods - is this not sufficient to make an appeal to the Government for reduction</p>

in housing numbers? It is the council's duty to fight on behalf of residents to maintain these special features unspoilt for future generations.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS1980

**Person ID** 1262709

**Full Name** Adam Griffin

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Comment** The 'vision' refers to environmental sustainability but would result in the loss of some 2000 acres of green belt land and open spaces and the green spaces it promises will result in the loss of 900 acres of the existing green belt land which does not make any sense at all.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS1994

**Person ID** 1143683

**Full Name** Mr Peter Brown

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Comment</b>	<p>Dacorum should push back further to Central Govt. The plan numbers place demands on Dacorum which in proportional terms is in excess of demands for other parts of the country. It represents yet further over development of the home counties.</p> <p>The strategic objective of requiring Berkhamsted to ‘play a much greater role in delivering growth in the Borough..’ effectively states that the town should take more than it’s fair share of population growth, with no mention at all that the infrastructure will be in place to support this.</p> <p>The loss of Green Belt land is wrong in principle, and will further harm the character of this area of the Chilterns and Berkhamsted in particular, sited as it is in a narrow valley with an already congested town centre.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2016
<b>Person ID</b>	1262719
<b>Full Name</b>	Richard Lythaby
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Throughout this plan you talk about the excellent green belt and the environment, with lots of green spaces.</p> <p>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.</p> <p>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.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2033
<b>Person ID</b>	1262731
<b>Full Name</b>	Julie Battersby
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Sufficient weight is not given to review of population change and there are additional aspects that should be included in the vision. See sections below.</p> <p><b>General Comment</b></p> <p>Even after taking into account that both Vision Statements are meant to be aspirational, I cannot shake off the thought that they are intended to persuade and misdirect rather than be informative. They assume the reader is desperate, gullible or worse.</p> <p><b>Overarching Vision For Dacorum's Growth</b></p> <p>As a vision I am pleased it includes the provision of new homes to have met the needs of older people, people with disabilities and those with specialist needs, however I am deeply disappointed that it does not include the vision of a <i>substantial reduction in unmet need for affordable and social housing in general.</i></p> <p><b>Environmental Sustainability</b></p> <p>The government is concerned about vulnerable species loss and achieving at least a 10% gain in net biodiversity, therefore recognition of the additional challenge should be included in the vision, such as: <i>We will have taken active steps to reverse the decline in local populations of our vulnerable native wildlife species and boosted biodiversity' .</i></p> <p>Ideally this would include that <i>'building developers have been supported and encouraged to cost-effectively maintain biodiversity and wildlife corridors and preserve the Chiltern Beechwoods and other important wildlife sites by embedding conservation principles into their development design'</i> e.g. include cat-flap sized holes at the bottom of fences to enable hedgehog recovery, install bird and bat boxes, ponds, etc. It is far cheaper to leave a hedge and verge intact and enhance it if there are gaps with a few native saplings, than it is to flatten it, pull out the hedges, lay turf and plant a few token young trees. In this respect an 'active step' would also include increased use of Hedge Retention Orders (with ideally a 10m buffer zone) on current rural hedges (which are usually surrounding farmland and pasture). There are</p>

many that are still present in areas of Dacorum described a 'urban' that are proposed for development that are currently receive protection under the Hedgerows Regulations 1997. The council has the power to continue both to protect the hedge and enable housing development if it chooses to do so.

The statement '*The impact of growth on the Chilterns Beechwood Special Area of Conservation will have been effectively mitigated*' is also a concern as it strongly suggests the decision has already been made that the Beechwoods are an acceptable casualty and that the measures to restore biodiversity (effectively with populations of common species rather than specialist habitat species) take immediate effect. It will take hundreds of years before saplings and turf become as species rich as the globally important Chiltern Beechwoods and our ancient hedgerows in Northchurch and sadly, they may never do.

In support of the Climate Change agenda, the achievement of a net reduction in Carbon Dioxide has two components, 1) reducing production of it and 2) increasing capture of it. *Increasing capture or at least maintaining current capture mechanisms* should be included in the vision. Conversion of farmland to housing will generally increase imports of food increasing our carbon footprint through transport related emissions. Unnecessary removal of our hedges, trees and woody verges will decrease capture, so why not strive to keep them?

### **Economic Growth**

The Innovation Quarter is an excellent vision, although I am concerned that there is a real risk that it will not achieve the 'Centre of Excellence' status needed to really thrive as an Enterprise Zone if there is not an early identified *partnership* developed with a leading academic or research institution, such as a Russell Group University. Consider two outstanding examples - Bristol Temple Quarter Enterprise Zone is a collaboration between the University of Bristol and Industry focusing on Digital and High Tech Innovation. A centre of excellence for Bio-Tech and Life Sciences is the Cambridge Compass Enterprise Zone which is facilitated by the expertise of graduate scientists from the Cambridge University scientific community.

Given the rise of home-based working following Covid, the vision should *support the creation of new home-based businesses and facilitation of working at home*. For this it is essential that all homes in Dacorum have access to superfast broadband, strong mobile phone signals and eased planning applications to convert domestic outbuilding for home office use. There are clear secondary benefits for the reduction of traffic, carbon dioxide, etc.

I am disappointed that in this section there is no recognition, declared support or direct preparation for the real prospect of areas of Dacorum becoming part of the proposed Chilterns National Park (as recommended in the Glover Report 2019, pg117). This would surely provide additional economic benefits and give a nominal commercial value to the maintenance of the view and beauty of sites adjacent to Areas of Outstanding Natural Beauty, as in Northchurch.

### **Vision For Dacorum's Places**

I take specific issue with the statement: '*All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.*' As a resident from the village of Northchurch, I share concerns with neighbours in the hamlet of Dudswell that the council does not appear to recognise that we regard our settlements as both distinct and separate from each other and historically distinct and separate from Berkhamsted.

We want to keep our local character – we are not Berkhamsted. If that is not recognised now, it will not be in the future for other settlements in Dacorum. Please... demonstrate your ‘detailed understanding of place’ and prove me wrong!

Therefore please consider adding the italics below to the points in section: **Berkhamsted will have grown and will:**

- Be an inclusive market town *that retains the character and rural feel of the adjacent settlements of Northchurch and Dudswell* and meets the needs and aspirations of existing and new residents and visitors.
- *Have interconnecting wildlife corridors along the canal and up either side of the valley forming strategic traversable connections to Bourne End and the major wildlife sites in Ashridge, Hockeridge, Dancers End and through to Wendover Woods.*

There are some Strategic Objectives that I believe should be enhanced as follows:

- Delivering Dacorum’s Future With Homes For Everyone
  - *To review and refine Dacorum’s housing requirements as significant new evidence becomes available (See # below the bullet points)*
  - *To substantially decrease unmet need for social housing*
- Generating A Vibrant economy With Opportunities For All
  - *To support working at home*
- Mitigating and Adapting To Climate Change
  - *To promote the use of renewable resources, reduce carbon emissions, protect natural resources, reduce waste and increase natural carbon capture.*
- Conserving and Protecting The Natural Environment
  - *To provide a biodiversity net gain that also supports recovery of vulnerable wildlife*
  - *To preserve and enhance networks of habitats, wildlife corridors, green and blue infrastructure*
- Enabling the Delivery Of Infrastructure
  - *To coordinate the delivery of sufficient new infrastructure with development*

# As the population data provided are based on 2014 Office For National Statistics (ONS) figures and a Census is imminent, a commitment to review need based on the latest trends should be included in this section. The CPREHerts (See CPRE Herts review of DBC Local Plan Final) calculate housing demand to be significantly lower based on the most recent 2018 ONS data. It has been reported that calculations made by the Economic Statistics Centre of Excellence show that the reduction in population size due to Covid is likely to be as many as 1.3 million people and their report consequently questions the accuracy of the current official estimates provided by the ONS which they believe are too high. This strongly suggests that demand growth trends, both are slower and will continue to be slower than estimated in the Local Plan, even allowing for some post-Covid recovery. Projections of need should be reviewed now based on the 2018 ONS data, again when the latest reliable update is available and thereafter several times over the course of the duration of the Local Plan.

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2046
<b>Person ID</b>	1262738
<b>Full Name</b>	Alan Pierce
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2078
<b>Person ID</b>	1262755
<b>Full Name</b>	Karen Johnson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Vision and Strategic Objectives. The targets are unrealistic for the demographic and structure of the landscape and the development targets are based on an out of date matrix. You will not decrease pollution (which by the way is already horrendous in Dacorum) by building more houses in areas where people are living up massive hills and need to use cars to get shopping etc. On top of that cutting down woods and destroying green belt damages further our already fragile environment and its ability to regenerate and purify the air around us. The bulk of the new homes are to be sited in what you call greenfield growth areas, the true name of which is Green Belt on the outskirts of Berkhamsted and Tring.

In arriving at this position the council have ignored national planning policy in the NPPF and the statements of ministers including the PM that green belt should not be developed except in exceptional circumstances. The council has made no effort to explain what the exceptional circumstances are in this borough for the removal of green belt. The councils proposals are neither justifiable or sustainable (the need of open space and woodland has been highlighted particularly with the covid situation of the last year, along with numerous reports of the dangers of losing wildlife habitats from the likes of David Attenborough, and the dangers of increased pollution on people's health with regard to fertility and lung and breathing complaints) and this is the core of our opposition to this draft plan. DBC should revert to the core strategy vision statement.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2082

**Person ID**

1261819

**Full Name**

Alex Rathmell

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

*Growth*

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2095

**Person ID**

1262762

**Full Name**

Eric Dodman

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	I am looking at the plan from the perspective of a Tring resident of over 35 years. The details of your plan are labarynthian in structure but really contain nothing but buzz words/sentences. The overriding impression is that nearly 3000 houses will be built in the TRing vicinity, many of them on green belt and near to AONB. The assertions of sustainability and renewal that have no facts behind them and will, in my opinion, totally destroy the look, feel and nature of our Market Town. I have no idea from reading your plans how Tring will accommodate the growth given that at a modest average of 3 people per new household that will be approximately 6000 people (including at least 2000 more children). In addition, an extra 2700 homes, at an average of 1.5 cars per home, will mean an extra 4000 cars on local roads that you, as a council, fail to properly maintain already. Tring already has limited parking and with potential extension options for parking being part of your development plan, I am not certain what can be done about that. In addition Tring has neither the current service station capability, which you have already tried to build on more than once, nor have I seen any mention of providing the necessary charging points when the country goes fully electric. On the the basis that life will eventually return to normal post COVID-19, Tring Station cannot currently cope with the number of cars to be parked at the station. In addition, the peak trains are always crammed.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2109
<b>Person ID</b>	1262797
<b>Full Name</b>	NICK TURNER
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I work in Real Estate and am currently working on downsizing plans for commercial real estate of c.30% - this will be millions of sq feet in London. I can say with personal knowledge that landlords are re-purposing this real estate into RESIDENTIAL. The demand for sub-urban commutable housing to London will be impacted as working patterns have changed permanently - work from home will remain as organisations have invested Millions into IT infrastructure.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

This is also in line with the Nations targets for decarbonising the economy - why are we about to build on green field land when we are looking ahead to counter the affects of climate change on our wildlife.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel

Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2145

**Person ID**

1262765

**Full Name**

Paul Rees

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The world is facing a climate and ecological crisis. This requires acknowledgement of the inconvenient truth that traditional-style growth needs to be abandoned and be replaced with green and sustainable growth. This plan will only add to the climate and ecological crisis by planning for many more homes and destroying more of our local environment. The number of new homes planned for in this strategy should be halved and only sustainable growth should be countenanced.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2154

**Person ID**

1261286

**Full Name**

John Saner

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>In my view Central Government's demand for 17,000 new homes in Dacorum is based on housing estimates which have been shown by the ONS to be a significant over-estimate probably by a factor of 2.</p> <p>Furthermore, since the estimates were originally produced, no account has been taken of the changes to employment, shopping and living patterns which will almost certainly arise from or be accelerated by the pandemic, and which will result in more currently commercial and retail space becoming available for repurposing as residential.</p> <p>In trying to comply with Central Government's demands, the plan places too much emphasis on development on Green Belt land, rather than maximising the use of brownfield sites. Of the proposed new housing, 60% is proposed on green belt land involving the loss of about 850 hectares of green belt. This is inappropriate in Dacorum, situated as it is, close to and partly in the Chilterns AONB</p> <p>If the housing projections are almost double current ONS estimates and more commercial and retail buildings become available for alternative use because of pandemic accelerated change, there will be scope for more development on brownfield sites and less need for building on the Green Belt.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2191
<b>Person ID</b>	1262841
<b>Full Name</b>	Nada Ryan
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	In theory the council's vision is a good one but actually cramming in an excessive number of new homes on Green Belt sites is not something I want for my family and my community particularly as the Council are ignoring national Planning Policy which both ministers and even the PM state should not be contravened except in "exceptional circumstance". The Council have not cited what these exceptional circumstances might be. I strongly feel the planned developments should not go ahead.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2217
<b>Person ID</b>	1262860
<b>Full Name</b>	Susanne Rees
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	Given the scale of the ecological and climate crisis, and also the stated aims to support sustainability and biodiversity and indeed promote healthy lifestyles, I am profoundly disappointed with the thinking behind this plan: which appears to be based on more and more growth. Unfortunately, the continued drive for growth is incompatible with promoting sustainability, biodiversity and healthy communities. The envisaged number of new homes should be halved and all villages in the green belt (including Kings Langley) should be protected and cherished for the areas of low mass housing that they are.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2239
<b>Person ID</b>	1258646

<b>Full Name</b>	Jane Timmis
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p><b>Dacorum's Vision</b> is one of urbanising utopia, in a largely rural region. It does not respect the beautiful countryside, Green Belt or the Area of outstanding Natural Beauty that make up the majority of our Borough. The proposal of approximately 1,000 houses to be built a year, totalling 17-18,000 by 2038 comes with <b>the sacrifice of approximately 2,000 acres of Green Belt and green field land.</b> Overwhelming our Market towns and villages with excessive development, sets out to be divisive not inclusive and not sustainable given the topography and current inadequate infrastructure. It is based on an estimated housing need of 16,899. <b>These are Government numbers which are not evidenced based,</b> but based on out-of-date 2014 data. The Office for National Statistics (ONS) recent data (2018) suggests a figure of housing need of <b>approximately 40% less.</b> Add to this a population decrease in 2020 of 1.4m, and the statistical need has been reduced to 170k per annum.</p> <p>As such, the Dacorum plan is grossly over estimated and should be rejected.</p> <p>We do need homes, but realistically only about 500-600 per year, based on up-to-date data of housing need. The types of housing envisaged are commendable, in particular affordable housing, and adaptable housing for the elderly and disabled.</p> <p><b>Sustainable Environment.</b> The Garden Community planned to the North of Hemel Hempstead, is attractive in concept but is being built on Green Belt abutting an Area of Outstanding Natural Beauty, largely in the rural Parish of Gt Gaddesden; and it is maintained that it is sustainable. A community of 1,550 homes (with another 4,00 to follow) built outside Hemel Hempstead, on Green Belt with no connections to the town centre or station, not within cycling/walking distance for the average person and no certain plans for infrastructure, just aspirations. It ignores the fact that the Borough, is geographically hilly and liable to periods of high rainfall. Not conducive to the average person cycling/walking anywhere far. It ignores the fact that in the rural areas of the Villages there are scarcely any buses, and the car is the only form of transport for most people. The same can be said for the planned developments of 2,200 houses on the outskirts of Berkhamsted and the 2,700 houses outside of Tring. It is hard to see how they can be sustainable, unless you have Council subsidised buses, (as currently these are private businesses) and regular 30 minute hop-on hop-off services.</p> <p>Yes, we do need more housing but <b>not in these numbers</b> which which will blight our countryside, Green Belt and AONB and cannot be argued to be environmentally sustainable.</p>

**Economic Growth** - while acknowledging the strategic location of Hemel Hempstead (and to a lesser extent Berkhamsted and Tring), it is only to be hoped that the business sector will continue to grow. Hemel Hempstead does have a vibrant industrial sector which has planned expansion built into the Plan. The expectation that Hemel town centre or any other town centre will continue to be a focus for shopping, must be less certain following the current Pandemic restrictions on smaller high street businesses. And what about Berkhamsted and Tring? The road connections in these market towns are congested at the best of times and the new communities are expected to use the A41 apparently, which is already heavily congested at the M25 end.

So much of the economic growth is based on Hemel Hempstead projections while elsewhere it is hoped that sheer numbers will generate economic growth?

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2249

**Person ID**

1262907

**Full Name**

David Beaumont

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The timing of this consultation is disappointing, with lockdown meaning that face-to-face questioning of the detail of proposals is impossible. Coupled with this, the government is making vague noises of 'building back better'. This may mean substantial changes to national directives for housing and employment.

Decisions made now could be rendered inappropriate.

The planned expansion in housing is massive and will lead to the loss of huge swathes of green belt. Whilst the strategy makes all the right noises about environmental sustainability and health and wellbeing it is difficult to see how these match up to the proposed loss of the environment. It is often said, but still true, that once the green belt has gone it cannot be returned.

It is perhaps time to reconsider some of these proposals.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2253
<b>Person ID</b>	1262697
<b>Full Name</b>	Gillian Lindley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Environment Sustainability -</p> <p>1. Brought into focus by the recent Covid pandemic restrictions, the shift to home working and decreased mobility means there is no sound argument for the significant dwelling capacity quoted, in particular as 2014 projections have been used for the local plan rather than later, lower, figures that should have been the basis for this plan.</p> <p>The correct approach should be to pause and reconsider the housing and infrastructure requirements, yes, nationally, but more particularly at local level, especially in the commuter areas surrounding London, such as Dacorum.</p> <p>2. Thames Water has already enquired of residents in Tring as to their water usage, and exhorting us to find ways of using less. How will a 50% increase in houses in Tring be environmentally sustainable in just this one utility?</p> <p>3. Flooding. The fields off Station Road to the east of Tring frequently flood in heavy winter rains, the addition of many hundreds of dwellings and associated infrastructure will further impact on local flooding.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2257
<b>Person ID</b>	1262925
<b>Full Name</b>	Nandipha Jordan
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Climate Change Emergency The central to the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.</p> <p>Overarching Vision: Environmental Sustainability The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency.</p> <p>All public transport must be electrified.</p> <p>At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers.</p> <p>All power must be supplied by electricity or hydrogen generated from sustainable energy sources.</p> <p>Overarching Vision: Economic Growth The affect of the covid is unknown on the economy, working and shopping practices. this is the wrong time to be making long term plans, which may soon be outdated. Preference should be given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders &amp; installers to help decarbonise Dacorum, and small and medium size businesses.</p> <p>Berkhamsted &amp; Tring Developments The housing need should be recalculated. The proposed number of houses to be built should be significantly lower than the target to reflect <b>actual demonstrable need</b> for housing and the high proportion of Green Belt and AONB land in Dacorum, with a primary focus on affordable starter homes</p> <p>Affordability needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.</p> <p>It is likely with the significant changes to working patterns due to the COVID pandemic, the need for housing will further reduce.</p> <p>The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.</p> <p>The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the</p>

green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2280

**Person ID**

610662

**Full Name**

Mr Antony Harbidge

**Organisation**

Chairman  
Berkhamsted Residents Action Group (BRAG)

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

All 'vision' statements are inevitably framed with positive language around well-meaning sentiments. The 'Overarching Vision for Dacorum's Growth by 2038' is no different with grand statements claiming improvements will be achieved relating to Environmental Sustainability, Economic Growth and Health and Wellbeing.

However, much of the plan under consultation works against those aspirations, particularly for the two historic market towns of Berkhamsted and Tring.

BRAG represents residents of Berkhamsted and Northchurch (as DBC consider Northchurch as West Berkhamsted) so will generally confine comments to issues relating to Berkhamsted and Northchurch, but much of BRAG's comments could equally apply to Tring.

Specifically, BRAG does not agree with 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth is simply too much for the town – with circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, it equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint (Google Earth used for calculations), most of which is located within sensitive ridge top locations in Green Belt.

BRAG notes that the 2013 Core Strategy vision of "*maintaining the strong valley and linear character of the settlement*" has been dropped for the new Local Plan. Where previously the Council asserted that "*The open valley sides and ridge top*

*locations are especially sensitive to new building and development in these locations will not be supported” (and put this argument strongly to the Planning Inspector), DBC now promote the land for removal from Green Belt and suggests that development can now be built “in a way that takes account of sensitive views and landscape”.*

BRAG strongly disagrees with this premise and believe the 2013 vision should be re-instated.

BRAG welcomes the vision to provide “*significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town*”, but BRAG fails to see in this plan any real commitment to make that investment in Berkhamsted. Siting developments at a distance (3-4km) from the town centre at the top of a significant hill (some gradients greater than to be found anywhere on the Tour de France!) will only serve to promote unsustainable high-carbon forms of travel rather than walking and cycling.

Indeed, the plan removes areas that have become and are becoming increasingly popular walking/rambling routes and easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes. Over the pandemic residents have not flocked to the likes of Velvet Lawn to do laps of a sports’ field, but rather the immediate and wider countryside.

The increased number of car movements within the expanded urban area will be circa 15,400 per day. Berkhamsted doesn’t have the road infrastructure to cope, nor is there the ability to provide it given the historic built nature of the town – BRAG focuses more on this in the comments on section 21 but suffice to say the plan being promoted cannot be anything other than detrimental to both the Environmental Sustainability and Health and Wellbeing visions.

BRAG finds it disturbing that Dacorum Planning have completely shifted the Council’s position from one of planning within the constraints of the Borough, with the wellbeing of current and future residents in mind along with protecting the unique and historic assets of the two market towns and their environments, to a position that makes no attempt to protect valuable assets of the Borough including large swathes of Green Belt.

Paragraph 1.37 of the introduction sets the tone by “making a bold commitment to significantly increasing the supply of land to deliver 922 dwellings per year.” From this point on the 922dpa target is taken as the single argument that “exceptional circumstances” exist that requires the removal of Green Belt.

BRAG disagrees with the housing target being set at 922dpa and will discuss this when commenting on other sections in the Plan, but frankly the dogged insistence that the target is the only requirement for Green Belt release needs correcting at the vision stage as it is clear that ‘The Vision for Dacorum’s Places’ has been retrospectively moulded to suit the absurd acceptance that the promoted plan can deliver the numbers without detrimental effects.

The 922dpa originates from Central Government, and specifically the Conservative manifesto promise, which has potentially been usurped by 1023dpa. BRAG has sympathy with DBC given the mixed messages from Central Government do confuse matters when deciding what the starting point for analysis will be, however Government has made it crystal clear that the numbers are a starting point only and it is up to Local Authorities to know if local constraints such as Green Belt means that the numbers cannot be delivered.

There are many examples that could be used, but BRAG has limited itself to highlighting just six examples of guidance issued by Government that shows the policy on Green Belt protection is clear and unambiguous:

- The NPPF provides protection for Green Belt and the land due to be released around Berkhamsted clearly pass the tests.
- In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming “demand for housing alone will not change Green Belt boundaries”.
- Paragraph 9 of the 2017 DCLG “Planning for the right homes in the right places: consultation proposals” 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.”
- On December 16th 2020 the Government published a response to the recent white paper consultations. With reference to protected landscapes and Green Belt it states “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”
- The same response goes on to state “We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.”
- And further clarifies “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’s sole justification for accepting Government’s numbers (922dpa) as a strict target is simply that “*Any option below the standard methodology would have to be robustly justified*” (paragraph 5.8 of The Development Strategy Background Topic Paper).

Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, BRAG fails to understand why DBC Planning felt unable or unwilling to make a case that can be “*robustly justified*”.

Indeed, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the new retrofit Borough Vision fails to reflect any of this.

‘The Vision for Dacorum’s Places’ for Hemel Hempstead is similarly confusing. The vision leads with “*The Hemel Garden Communities programme will be delivering new homes, green spaces, green businesses, and community facilities and is a catalyst for transforming Hemel Hempstead and taking forward the legacy of the New Town*”.

But the bulk of the dwellings that make up the Hemel Garden Communities initiative are being held back to be delivered after the Plan timescale. So, it is difficult to understand how they are going to contribute to a 'vision' for the town over the plan timescale when the land is to be 'safeguarded' over that period.

Most of this land is Green Belt and, as stated above, the Government numbers do not constitute the exceptional circumstances required take the land out of Green Belt. But then as the bulk of the development is after the Plan period and doesn't form part of the allocation to meet the 'targets', DBC clearly have other exceptional circumstances for removing the Green Belt status, but those circumstances are not evident in this Plan.

DBC are receiving funding from Government to help develop the Garden Communities program and BRAG understands that the Garden Communities project is in fact a joint initiative with St Albans.

Any cross-boundary initiatives can be complicated, but if the 'exceptional circumstances' required to change the land designation is the chance to transform Hemel Hempstead, then DBC have completely missed the opportunity to provide a truly bold regenerating vision for the Dacorum's main town.

In truth, these plans simply lay the foundation to tack on new housing estates long past the Plan period that fail to rejuvenate Hemel Hempstead and in the meantime destroy the historic character and setting of Berkhamsted and Tring.

In the context of the Local Plan out for consultation the visions outlined are far removed from reality. To be credible they should stand a realistic chance of being achievable. So, in summary, it is BRAG's contention that as currently presented the draft Plan is unsound and would not pass Public Examination.

<b>Included files</b>	<a href="#">BRAG 2021 submission to DBC Local Plan Consultation - FINAL.pdf</a>
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2313
<b>Person ID</b>	1262984
<b>Full Name</b>	Deborah O'Sullivan
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<b>Over-provision of housing based on inaccurate and superseded data</b>

I believe the council's vision is flawed as it is based on out of date ONS data which has led to a significant over-estimate of Dacorum's housing needs. Please see my comments for Question 7. Put simply, the predicted levels of growth and hence yearly targets for associated housing development are too high.

**Climate Emergency Issues**

Dacorum Borough Council has declared a climate emergency and indicated that this should be a central pillar in any future plans for the borough. This local plan vision as published prioritises economic growth and greenfield land development over considerations for the climate emergency. 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.

**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)

**Berkhamsted & Tring Developments**

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2314
<b>Person ID</b>	1262981
<b>Full Name</b>	Chris Mabley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	There is no evidence that this can be achieved. Past performance indicates vision does not materialise because DBC planners do not have the powers to enforce policy let alone vision. Blue sky visions are not the same as strategic plans and amount to hot air and broken promises in this context: <i>By 2038, Dacorum will have embraced the next phase of its development by having built on its strengths and the opportunities to deliver balanced communities with the homes, jobs</i>

*and supporting infrastructure needed. As a result of having managed the change, Dacorum will have remained an attractive and desirable home for residents and for a wide variety of businesses.*

*New housing will have been provided in sustainable locations to a high standard of design. Affordable housing will have been provided and been genuinely affordable having had regards to local circumstances and new homes to have met the needs of older people, people with disabilities and those with specialist needs. New housing will have delivered our ambitious place-shaping objectives and secured high quality design and sustainability outcomes. All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.*

As evidenced by LA3 West Hemel Hempstead and Ashill development on Pix Farm Lane, Bourne End.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2327

**Person ID**

1262957

**Full Name**

Gregory Hukins

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The plan does not provide a happier healthier safer dacorum. The happiness and health benefits of the fields, trees and woodland are being ignored as the plan is encouraging the removal of precious greenbelt land. This land provides value to the environment, community physical and mental health. It is definitely not promoting a green and attractive Dacorum but rather a suburban sprawl. The plan changes the nature of the local road network making it more built up increasing traffic and air pollution.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2361

**Person ID**

1261821

<b>Full Name</b>	Chris Cole
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Uncaring destruction of the Green Belt to provide building land - lots of talk about planting new trees, why concrete over what's already here?</p> <p>No mention of increased public transport - cycleways and pathways are fine, but what about less active people? Bus services have declined over the last 5 years, there needs to be planned development of the bus network, not just relying on the whim of the bus operators.</p> <p>Berkhamsted and particularly Tring are shouldering the burden of the housing growth outside Hemel Hempstead for the whole of Dacorum. If the need for housing is Dacorum-wide, the burden should be shared across the borough. The character of <i>all</i> communities needs to be protected, not just villages.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2370
<b>Person ID</b>	1254107
<b>Full Name</b>	Polly Eaton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	No
Comment	I fully understand that extra housing is needed, however I think the proposal has no recognition of the climate crisis and has made very few recommendations in light of current environmental government policy. There is an emphasis on carbon off setting and retro fitting which is not addressing the 'climate emergency' which Dacorum has signed up to.
Included files	
Consultation Point	Borough Vision to 2038
Comment ID	EGS2402
Person ID	1227518
Full Name	Mr John LOWRIE
Organisation	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
Comment	BrexitCovidCovidDacorum's
Included files	
Consultation Point	Borough Vision to 2038
Comment ID	EGS2460
Person ID	1151964
Full Name	MR RICHARD COWIE
Organisation	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
<b>Comment</b>	<p>In general terms, I feel that the aspirations for the future of the towns and villages described in the Dacorum Local Plan are inappropriate and based on obsolete estimates of population growth and fail to give sufficient weight to the importance of agriculture and the establishment of a carbon neutral economy.</p> <p>Whilst accepting the need for a degree of organic growth of the towns in Dacorum, I consider that the establishment of a balance between the numbers of houses and business premises in the towns on the one hand, and the rural environment on the other, are of the utmost importance. The Chilterns landscape with its hills and steep-sided valleys inevitably limits the space in which to build new housing estates without permanent loss of agricultural land and damage to the local amenity. I have particular concerns about the proposals for Tring and will comment in section 5 below.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2469
<b>Person ID</b>	1263080
<b>Full Name</b>	Russell Emson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2481
<b>Person ID</b>	1261609
<b>Full Name</b>	DEBORAH CROOKS
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Climate Change</p> <p>Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.</p> <p>The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.</p> <p>Overarching Vision: Environmental Sustainability</p> <p>The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. grey water tanks should also be part of new home construction. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.</p> <p>Overarching Vision: Economic Growth</p> <p>In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders &amp; installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.</p> <p>Berkhamsted &amp; Tring Developments</p> <p>I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.</p> <p>The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.</p> <p>The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.</p>

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2484

**Person ID**

1153910

**Full Name**

DAGNA HORNER

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

I do recognise the need for extra housing but am appalled by the proposal that so much of it should be sited on Green Belt land. This does not seem either necessary or proportionate. I do not think that the DLP takes enough consideration of the Chiltern AONB, the Chiltern Beechwoods Special Area of Conservation or the possibility of there being a national park in this area.

I was surprised to learn the number of additional dwellings required was taken from the ONS document written in 2014 rather than the one from 2018, where the number of new dwellings needed is set at 341 rather than 922. DBC appear to be over-providing.

DBC declared a climate emergency a year ago but do not seem to be taking this seriously. Much of the extra housing will be built at a distance from amenities and would require a large number of car journeys for shopping, school and amenity access. Traffic will be increased with resulting pollution and carbon expenditure. Even electric cars pollute and they are not yet in general use.

Can enough additional water be provided and the sewage treated? The Gade already suffers from too much extraction and recent summers have been dry. Our chalk streams are a rare and valuable asset.

With the likelihood that our shopping habits will be changed even after all lockdowns are over, surely there will be redundant premises in the local High Streets which could be converted into residential units or demolished to provide sites for more houses? There are many brownfield sites which should be used before any Green Belt land is taken.

I hope that you will take my comments into consideration.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2485

**Person ID**

1263087

**Full Name**

Alan Kondys

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

I would like to see evidence that supports the stated number of houses needed and that the formula used to arrive at this number is correct.

For example, in Berkhamsted what is the current number of houses?

What is the proposed addition in the Plan as a %?

What is the evidence behind this increase % being needed?

Understand the actual requirement may be almost half of that proposed. Needs to be based on up-to-date statistics.

Need to publish details of any brown field sites not being utilised.

Need to explore/publish details of housing numbers that could be realised from conversion of commercial space.

Covid 19 is likely to mean commercial space will become available.

This is not considered in the Plan.

There is an opportunity, particularly in Hemel Hempstead, to use capacity available for homes in the town centre and make this part of a broad town regeneration project to bring life and soul to the centre (not build houses in fields on the outskirts so people have to travel in and out).

Above could mean that the green belt land is not needed and should not be unnecessarily released.

The plan seems to be more about releasing land that is easy to build on and more profitable for developers.

Once green belt is gone its gone and you/we have a duty of care and obligation to get this right for future generations.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2489

**Person ID**

1259206

**Full Name**

Greg Smith

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

No I strongly object to the council building more expensive houses we do not need on green belt land. Taylor Wimpey has in some cases reduced the prices of the new homes currently under construction at Bearroc Park Phase 2 which shows they are not needed in the first place. More overpriced home that are NOT affordable to the wider population which are miles out of town thus bringing in more vehicles to our congested streets is not the answer for our town.

The council cannot deliver the 'themes' it promises given the already unmanageable levels of traffic congestions, waterway & air pollution in the town already.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2494

**Person ID**

1263101

**Full Name**

Richard Hall

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>Overarching Vision</p> <ul style="list-style-type: none"> <li>- Supporting services and infra must lead the new housing. You have the vision in the wrong order.</li> </ul> <p>Environmental sust</p> <ul style="list-style-type: none"> <li>- water quality should be better (not just good)</li> <li>- no mention of public footpaths</li> </ul> <p>Vision for places - Berkhamsted</p> <ul style="list-style-type: none"> <li>- no mention of how existing housing can be improved/supported?</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2510
<b>Person ID</b>	1261408
<b>Full Name</b>	juanita mann
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No

<b>Comment</b>	<p>Parliament has declared an Environmental and Climate Emergency (2019), there is pressure to deliver more from our farmland, the UK is putting pressure on other countries to preserve rainforest, there is growing recognition of the importance of green space for mental wellbeing etc yet Dacorum is proposing building on the Green Belt. How are these actions reconcilable?</p> <p>How many other market towns are being targeted with a 55% growth in this time period?</p> <p>Why is there so little emphasis on the rejuvenation of our town centres and brownfield sites? Is it that developers prefer large open sites where they can maximise profits as fast as possible.</p> <p>Affordable housing is essential with good communication links and easy access to town centres. This plan encourages high end, car centred housing, in urban sprawl developments on Green Belt.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2513
<b>Person ID</b>	1263124
<b>Full Name</b>	Andrew Criddle
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>The Plan states:  “2.18 Supporting the significant long-term growth at Hemel Garden Community - which as one of few flagship growth schemes supported by the County Council - will require prioritised funding. In addition, our other towns will also be experiencing significant growth and will also require investment in infrastructure.”</p> <p><i>Comment: The need to fund infrastructure in Hemel Hempstead is unquestioned but there is also a need (given the size of population increase) for major funding of infrastructure in Berkhamsted and Tring which should include sport and leisure facilities. S106 and CIL monies should therefore be allocated local to developments but also consolidated to contribute funding to development of major facilities and sporting hubs in all 3 towns.</i></p> <p>The Plan states:  “3.3 The Strategy has informed the early stages of developing the strategic objectives of the Local Plan. It guides how we can meet the challenges of future growth, and covers six over-arching themes:</p>

Theme 1: Building Dacorum's future with homes for everyone.

Theme 2: Generating a vibrant economy with opportunities for all.

**Theme 3: A happier, healthier and safer Dacorum.**

**Theme 4: Creating a clean, green and attractive Dacorum."**

*Comment: Sport has a key role to play in delivering on the two highlighted themes and therefore requires appropriate consideration and funding – which is conspicuously missing from the all elements of the and especially from the overall strategy.*

The Plan states:

"3.6 Hemel Hempstead will have grown significantly, and the Hemel Garden Communities programme will be delivering new homes, green spaces, green businesses, and community facilities and is a catalyst for transforming Hemel Hempstead and taking forward the legacy of the New Town."

*Comment: The green spaces need to include additional new playing space and sports facilities - particularly within the Hemel Garden Communities but also in developing and expanding existing sporting facilities across the Town to meet existing shortfalls and new demand.*

The Plan states:

"3.6 Berkhamsted will have grown and will have delivered a mix of market and affordable housing, new community facilities, including two primary schools and a secondary school, and a hierarchy of open spaces.

*Comment:*

*The need for additional playing space in Bekhamsted is as well documented as that in Tring. While the vision for Tring acknowledges this need by indicating that it will "have provided significant new open space and sports/leisure facilities", no such provision appears within the plan for Berkhamsted. What is more, the one site that could make such a provision (Bulbourne Cross) has not been selected for inclusion into the plan. Its rejection apparently for reasons of affecting views from AONB – something which could also be said of selected Tring sites. We believe the Bulbourne Cross site should be reconsidered and that new open space and sports/leisure facilities should be a strategic objective for Berkhamsted.*

The Plan states:

"3.6 Tring will have grown and will be an inclusive market town that meets the needs and aspirations of existing and new residents and visitors; ...have delivered a mix of market and affordable housing, new community facilities, a new business hub, two primary schools and a secondary school; have provided significant new open space and sports/leisure facilities to the east of the town"

*Comment:*

*More information is needed on what will be in these sports/leisure facilities, how they will respond to local need, how local delivery partners will be involved in planning and developing these facilities and the management and stewardship of them.*

The Plan states:

### 3.7 Strategic Objectives [include]

#### Supporting Community Health, Wellbeing and Cohesion

- To promote healthy and sustainable communities and a high quality of life.
- To provide for a full range of social, leisure and community facilities and services.
- To promote social inclusion and cohesiveness, embrace diversity and reduce inequalities.
- To enable and support active lifestyles through the provision of open space, sports and recreation facilities.

#### *Comment*

*There is already a shortage of appropriate quality sporting facilities for many sports and in most of the towns and key community areas within Dacorum. In many cases this is not due to lack of funds but lack of space to accommodate new facilities or expand existing ones. These current shortages are defined in the Playing Pitch Strategy & Action Plan (June 2019) and also in Indoor Sporting Facilities studies for the area. They are also clear from representations that we and other community sports bodies and clubs (such as the FA, Berkhamsted Raiders and Tring Sports Forum) have been making direct to DBC and HCC in recent years.*

*With such a significant increase in housing numbers and the associated increase in population, this undersupply will increase to a critical level. Therefore, a coordinated plan is needed to provide the necessary new playing spaces and other facilities that will be required – including where these can be located and when this can be facilitated, and possibly part funded by individual or consolidated developers/developments.*

*The Council's PPS identifies the projected increase in demand for grass pitches resulting from 17,425 additional dwellings to 2036 as requiring more than 50 new playing pitches and three AGPs in addition to the current shortfalls.*

*DSN believe that the new local plan must include allocation of potential sites for new sporting facilities – especially sporting hubs (see our attached representation overview). This should obviously be incorporated into the infrastructure plan, but we also believe it should be considered as part of the site allocations decision in the main Local Plan – especially, to ensure that sporting hubs and major multi-use/multi-sport facilities are allocated the space needed in conjunction with the sites for housing.*

***(NB Supporting Evidence -NPPF, MHCLG, Feb 2019, Paragraph 96 –***

*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.)*

*We consider it vital also to protect rights of way which need to be maintained or possibly diverted. This applies to footpaths and bridleways in particular, plus Restricted Byways and Byways Open to all Traffic. These are important where the barrier of the M1 already restricts and/or cuts the RoW network.*

*Any existing sporting sites/facilities that are displaced by new housing or economic development must be found new equivalent or improved/expanded sites as appropriate – e.g. Hemel Hempstead Riding Centre.*

*The Council needs to work with local sports clubs and local sporting organisations such as DSN to achieve the above strategic objectives and to ensure it can deliver the significant expansion of sporting infrastructure required to meet the increase in demand from the momentous growth in population. This will need to include exploring opportunities for major new multi-sports hubs in Hemel GC, Berkhamsted and Tring.*

<b>Included files</b>	<a href="#">Dacorum Sports Network - Andy Criddle DSN response to local plan overview_Redacted.pdf</a>
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2514
<b>Person ID</b>	1263140
<b>Full Name</b>	Mr B & Mrs A Goddard
<b>Organisation</b>	
<b>Agent ID</b>	1262938
<b>Agent Full Name</b>	Steven Barker
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2517
<b>Person ID</b>	222269
<b>Full Name</b>	Georgina Tregoning
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I believe that the proposed number of houses to be built should be significantly lower than the target to reflect <b>actual demonstrable need</b> 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.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2520
<b>Person ID</b>	1263143
<b>Full Name</b>	Manlet Group Holdings Limited
<b>Organisation</b>	
<b>Agent ID</b>	1262938
<b>Agent Full Name</b>	Steven Barker
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2535
<b>Person ID</b>	1159198
<b>Full Name</b>	Edward Hatley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	I do not agree with the vision and strategic objectives relating to Berkhamsted. The proposal to build some 2200 dwellings in Northchurch and Berkhamsted equates to an increase of about 25% and a staggering 30%+ growth in the urban footprint. No acknowledgement seems to have been made of the fact that Berkhamsted is located in a valley. In previous documents the Council said that "the open valley sides and ridgetop are especially sensitive to new building and development in these locations <b>will not be supported</b> " DBC are now promoting the land for removal from the Green Belt. The proposal to site new builds at the top of a valley some 1.5 miles from the town centre coupled with steep gradients will only serve to increase car journeys and will not promote low carbon emissions. Furthermore, it seems likely that there could be over 15,000 additional vehicular movements a day into a road structure limited by the valley and that is already congested. The plan in its current form will do nothing to promote either sustainability or a healthy environment. The Government has stated that the Green Belt should be afforded the highest protection. I can see no valid reason given to override this statement.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2538
<b>Person ID</b>	1263174
<b>Full Name</b>	katey adderley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	You have just rolled over and accepted more than a doubling of new homes vs the Core Strategy without any reasoning. We are not meant to build on Green Belt unless "exceptional circumstances". What is exceptional here? Has the council not read and understood the national planning policy?
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS2549
<b>Person ID</b>	1263183
<b>Full Name</b>	Claire Davies
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>We are in the middle of a pandemic, which will have a fundamental, as yet unclear, long-term impact on the way, and where, people live and work. It strikes me as very odd to pushing on with this plan, when we are going to end up with unrecognisable town centers and different requirements in terms of shopping, leisure facilities and housing post COVID.</p> <p>As one example, many stores in Hemel Hempsted town centre won't reopen, including the large flagship Debenhams store, rather than building new homes on green belt, shouldn't we be looking at whether we can repurpose areas of our city centres which are currently used for shops, as housing?</p> <p>From the evidence I've seen, you have significantly over-estimated the number of new houses required, so I think you need to stop and look again at that. Also, from what I've read you are making token gestures towards climate change and sustainable transport, which will not adequately tackle these significant issues.</p> <p>Finally, as someone who works in digital technology, the user-interface of this feedback tool, is clunky and would be very difficult someone who is not tech savvy to navigate. I think you ought to give the public more time and more ways (when many of them are, rightly so, distracted by the many problems COVID has caused) to have their say.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2563
<b>Person ID</b>	1262037
<b>Full Name</b>	Jason Silver
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	I do not believe in the Central Government requirements of circa 17k homes for Dacorum over the next 18 years and therefore think that this needs to be challenged. The areas as I understand it can support approx 11k from urban area building but with the rest coming from greenfield/green belt sites which is not acceptable and a rethink is required. Therefore a push back would seem in order. I dont think this is exceptional circumstances and green belt sites should be excluded
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2566
<b>Person ID</b>	1261636
<b>Full Name</b>	James Lane
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>This is a quick though out plan that is now not fit for perpose. I ask for more time, for the poeple of Hemel and Dacorum to be able to look more closely at this 'growth plan' as the recent pandimic has not given the majority of people the proper time and thought that is needed. Rather than have it pushed through quickly and underhandly.</p> <p>I would also point out that you look again at your sums of how many house are needed as the recent pandimc will have had an impact this 'planned future growth'. Also the amount of time that has passed since this plan first put together.</p> <p>I also point out that any rapid growth like that in the plan does not help with the health or happiness of the towns residents. It only pushes for over cowrding.</p> <p>Also is the planned growth for the community or the developers?</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2574
<b>Person ID</b>	1263196
<b>Full Name</b>	Alizon Henderson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>As a long term resident of Dacorum -over 50 years I have watched ugly, environmentally damaging and just plain bad development proliferate. In Berkhamsted masses of large housing estates catering for people with equally large bank accounts.</p> <p>I have watched with interest my now home town of Tring. I see the same thing here. Developers grow rich on Green belt /AONB land .eg Cala Homes.</p> <p>I am deeply sceptical of the motivations behind future - ' environmentally sensitive-Climate friendly - affordable etc developm</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2587
<b>Person ID</b>	1263206
<b>Full Name</b>	Andrew Farrow
<b>Organisation</b>	Great Gaddesden Parish Council
<b>Agent ID</b>	1253616
<b>Agent Full Name</b>	Andrew Farrow
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

\* No

**Comment**

**Introduction**

Great Gaddesden Parish Council strongly opposes the draft plan due to it being based on overstated and superceded housing demand figures, lack of detail on critical details such as infrastructure and sustainability, coupled with an unnecessary material expansion into the Green Belt, in direct contrast with the Government's stated aims and the views of the local community.

Specifically:

- the development of 5,800 houses on 17% on the border of the AONB and the associated increase in traffic both from this development and those in Berkhamsted and Tring represents an overwhelming and completely negative transformational change in the nature of the area, and will force a materially increased volume of traffic through existing chokepoints including multiple accident-prone single-vehicle passing places
- the majority of the proposed major developments cannot be described as "sustainable" given their distance from existing infrastructure and no plans of any substance to ensure improved and sustainable solutions
- critically, the sustainability analysis has an inherent bias and is misleadingly only based on land available for development rather than providing a benchmark against the ideal sites. There are demonstrably more optimal areas to develop that are immediately adjacent to existing sustainable transport infrastructure.
- neither the Infrastructure Development Plan nor the Transport Plan are complete and under the current process it will not be possible to comment in any meaningful way on the Plan without the benefit of these significant elements.
- the Borough is adopting a housing growth figure which is not consistent with the Government's express intent to protect Green Belt land. The Government's response to the local housing need proposals of 16th December 2020 stated "... *that 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*". Furthermore, in the responses to the 2017 consultation our community 95% of respondents didn't agree with the proposed approach to Green Belt

As such, Great Gaddesden Parish Council cannot support the flawed draft Local Plan and objects to its adoption.

**General**

We appreciate the fact that the consultation period was extended, although this should have been agreed at the outset rather than imposing a significant workload during a national lockdown and over the Christmas holidays, which self-evidently were always going to make it extremely difficult both to give the plan the attention it deserved and to undertake adequate public consultation.

However, we are still extremely concerned that the consultation has proceeded given that:

- shortly after publication the Government changed its guidance on the level of housing growth required by the Borough, a key driver of the plan, and it now appears that the Borough is adopting a housing growth figure which is not consistent with the Government's express intent to protect Green Belt land.

- it is very difficult to understand how the majority of the proposed major developments can be described as “sustainable” given their distance from existing infrastructure.

- neither the Infrastructure Development Plan nor the Transport Plan are complete and under the current process it will not be possible to comment in any meaningful way on the Plan without the benefit of these significant elements.

Great Gaddesden Parish Council has a particular interest in The Hemel Garden Community (HGC) proposal. The development of 5,800 houses on 17% of the parish’s land over the next 20+ years right up to the border of the AONB and the associated increase in traffic both from this development and those in Berkhamsted and Tring represents an overwhelming and completely negative transformational change in the nature of the area.

The Parish Council is concerned that:

- the proposals take insufficient account of previously identified urban capacity before building on the Green Belt.

- the sustainability analysis is misleadingly only based on land available for development rather than providing a benchmark against the ideal sites.

- the plan doesn’t include any commitment to invest in the infrastructure necessary for small villages and hamlets in the Borough to prosper.

- whilst protecting the small villages and hamlets from housing development, the Plan is silent on protecting them from increased traffic; indeed, it seems that the intention is to re-route traffic from Hemel Hempstead in particular through the small villages.

The Plan does not meet the needs of our community and its ambitions will undermine the quality of life of our residents. We urge the Council to suspend the consultation process, to consult with the Government to obtain clarity on the appropriate housing target, and to re-submit the Plan for a further Regulation 18 consultation once the housing target is finalised and other key elements of the plan are completed.

### **National Policy Reforms**

We sympathise with the problem of producing a plan against the background of proposed changes to the national policy framework, but given that uncertainty the Plan cannot afford to have any ambiguity about its relationship with that framework. For example, in the introduction to the main Plan document it states (1.8):

“Although it is unclear how the Government will respond to the consultation [regarding the white papers on Planning for the Future and Changes to the current planning system] we have already taken some steps to reflect some of the proposals. These included ... introducing the simplified zoning categories”.

But in the section dealing with National Policy reforms (14.8) there is no reference to the impact of zones, and in the Green Belt and Rural Area Topic Paper it states (s2.27):

“This [Planning] White Paper seeks to introduce a number of planning reforms to the planning system in England, please note these are only proposals to be aware of and they do not apply to this current Local Plan consultation that is taking place from November 2020 to February 2021”.

We assume that the main Plan document takes precedence and that the intent is to adopt the three zone approach outlined in the White Paper, but if this is the case we are concerned that:

- given the uncertainty around house targets (see below) there is no clarity about what might happen were the plan to be adopted but the housing target reduced, since our understanding of the white paper proposals are that once an area is defined as a growth zone in an adopted local plan there is in principle agreement for the location, use, and amount of development on a site.
- there is no clarity about what might happen to the growth zones identified in the Plan if the amount of windfall housing exceeds the 2,400 estimated in the sources of housing land supply. Given that we are already aware of two proposed developments totalling 1,500 houses (21/00171/SCE 400 houses along Leighton Buzzard Rd and 1,100 homes in the Bulbourne Cross development near Berkhamsted) which don't feature on land identified for growth in the Plan this appears to be highly likely.
- there is virtually no reference in the Plan to protection zones.

The decision by the Government to withdraw some of the proposals in the White Paper only months after it was published amply highlight the risks of building a plan on a consultation paper.

We believe that it is inappropriate to base the Plan around the three zone approach until this is a statutory requirement.

### **Use of Green Belt land**

The Plan calls for significant development on Green Belt land but is silent on the full extent of that development which has been estimated by CPRE at 746 hectares. The use of Green Belt land is contrary to the wishes of our community as was overwhelmingly expressed in the responses to the 2017 consultation where nearly 95% of respondents didn't agree with the proposed approach to Green Belt and Major Development sites. It is clear from Cllr Williams' letter of 30th November 2020 to the Secretary of State that the Borough Council recognises that the same concerns are likely to arise again from the current consultation.

Development on Green Belt land also runs counter to the Government's response to the local housing need proposals of 16th December 2020 in which it stated

"... that 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".

We also understand that one of the reasons that the Inspectors halted the Public Examination of the St Albans Local Plan was its over-reliance on a few very large strategic Green Belt allocations. Finally we see insufficient evidence that Dacorum has looked widely enough to meet its housing commitments from less sensitive, more sustainable, sites.

The National Planning Policy Framework requires that the demonstrable benefit of the proposed release of Green Belt land outweighs the adverse impact of building on it. We dispute the assumption in the Plan that this hurdle has been met.

### **Housing needs assessment**

We note that since publication of the Plan the Government has revised its method of housing needs calculation but we oppose its proposal to revert to using out of date data from 2014 which result in an increase in the target for housing needs in Dacorum (and Hertfordshire as a whole).

We cannot support using a housing needs methodology that is not based on up to date demographic and housing data, in this case the 2018 ONS data, and doesn't take sufficient account of Green Belt and AONB constraints; we fully support the request in Cllr William's letter of 30th November 2020 that greater weight be placed on these constraints.

We also note that on the 16th December 2020 the Minister stated that the Ministry's projected house building numbers are not a target which in the context of those remarks we understand to mean that more weight will be given to Green Belt constraints.

Given that the Government has withdrawn the housing needs methodology on which the Plan is based, that the revised methodology uses out of date data, and that the Government has stated that its projected building numbers are not a target, the Plan should be withdrawn until there is clarity regarding Dacorum's housing need assessment.

### **Transport and Movement**

We support the Plan objective (2.13) that "new development needs to be located in places which have excellent access to jobs, shops, services and can quickly and easily be reached by sustainable public transport and benefit from high quality walking and cycling infrastructure", but this is completely at odds with the proposed major development sites, particularly in North Hemel Hempstead.

We have particular concerns:

- that in practice the prime consideration in site selection appears to be land availability rather than appropriateness or sustainability (Site Selection Topic Paper 2.35).
- that the Council is still "continuing to develop the transport proposals that will be included within the Plan" (21.18), providing only limited evidence as to how sustainable public transport will be delivered.
- about the implications of the new transport corridor to the north of Hemel Hempstead (10.4 & 21.17) on traffic through Berkhamsted, Potten End and Great Gaddesden Parish (in particular Water End).
- that the need to develop sustainable transport options for rural settlements seems to exclude settlements not identified for growth in the Plan (21.16).

This is our only opportunity to have a meaningful input to the Plan, and the transport infrastructure to support a planned 25% increase in population is clearly key to understanding how the Plan can be sustainable. We cannot support a Plan without the details of the transport plans which underpin it.

### **Infrastructure**

Clearly when considering a proposed 25% increase in population the provision of adequate infrastructure is key, but there are only three pages about infrastructure development in the Plan (pp 49 – 52). The draft Infrastructure Development Plan (IDP) is available but will continue to be developed (10.5) and as a result it is difficult to know what reliance to place upon it. The Council itself recognises that:

“The IDP is also a key tool in the assessment of development viability, which the Council is continuing to develop to ensure that the required infrastructure can be delivered and development remains viable.” (10.5)

We are also concerned that, as with transport, improvements to the Borough’s digital network appear to be limited to new development (21.50) making it harder to sustain existing smaller villages.

This is our only opportunity to have meaningful input to the Plan. We cannot support a Plan without the details of the infrastructure development that will underpin it.

### **Natural Environment**

With the underlying chalk aquifer already assessed as being “over-abstracted” we have concerns over the ability of the water supply to be able to accommodate the needs of a 25% population expansion without impacting the natural environment.

### **Overarching Vision**

The main problem with the Vision is not what it says, but what it leaves unsaid; no-where in the Plan does it state that the Vision is to build on 746 ha of Green Belt land up to the edge of the AONB. To represent the Hemel Garden Communities programme involving a development of 5,800 new houses as “delivering new ... green spaces” (p23) when it involves building on 372ha of the Green Belt is quite simply a gross misrepresentation.

The Vision is also silent on the support to be provided to the surrounding small villages and hamlets. Improved digital connectivity and sustainable transport, in so far as it is possible to tell from the incomplete work in those areas, appear to be initiatives limited to the localities which will see housing development. The objective should be for all residents of Dacorum to benefit to ensure the sustainability of those smaller communities.

The Vision commits that smaller villages will be “protected from development” but is silent on the impact on those villages of increased traffic flows which are an integral part of the Plan. There should be a commitment to protect smaller villages from increased traffic flows.

The Plan does not meet the needs of our communities and its ambitions will undermine the quality of life of our residents both through the loss of open space and a failure to commit to invest.

It is not our Vision for the future of Dacorum.

### **Included files**

### **Consultation Point**

Borough Vision to 2038

### **Comment ID**

EGS2590

### **Person ID**

1145686

### **Full Name**

Mrs Sarah Gray

### **Organisation**

### **Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The plan seems heavily dependent on new houses which will make the other objectives difficult to achieve. Building 1000's of new homes in the smaller Dacorum towns will change the character of Dacorum. Increasing the size of the communities will not help to improve the living conditions for current residents.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2609
<b>Person ID</b>	1262737
<b>Full Name</b>	Andrew Cassels
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Its a little 'motherhood and apple-pie'. Who could object? The issue is can you deliver it without overcrowding the small historic market town of Berkhamsted and will you provide the infrastructure to support the increase in traffic and the cycleways and pavements that allow children to safely walk or cycle to school? There is your challenge!</p> <p>You failed to improve the pavements from Berroc Park, Shootersway to Ashlyn School - the stretch near to the traffic lights at Kingshill Way are narrow and dangerous.</p> <p>The new traffic lights are dangerous for traffic turning right from Kings Road into Shootersway. They need adjusted to safely allow turning right without the risk of collision from traffic racing along Kinghill Way to beat the lights.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2637

<b>Person ID</b>	1263231
<b>Full Name</b>	Mr Phil Robinson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate</p> <p>Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2654
<b>Person ID</b>	1263235
<b>Full Name</b>	Mrs Vanessa Robinson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

## Comment

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

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Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2665

**Person ID**

1161597

**Full Name**

Stuart Mears

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2675

**Person ID**

1263237

**Full Name**

Dr Alice Mears

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.</p>

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2684

**Person ID**

1263240

**Full Name**

Stuart and Val Burnett

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2693

**Person ID**

1263241

**Full Name**

Mr Stephen Hurley

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2704

**Person ID**

1263245

**Full Name**

Mr Paul Barritt

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.</p> <p>I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the</p>

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2720

**Person ID**

1263249

**Full Name**

Claire Whitely

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The scale of the housing target for Dacorum (25% growth) seems disproportionate considering there is only a 9% population growth forecast by ONS in that time.

The plan's approach of prioritising development in Hemel Hempstead makes sense as this would make the most of the brownfield land and local services while reducing the impact on the green belt.

Within the plans, Tring is expected to take a substantially disproportionate portion of the new housing for Dacorum with a 55% increase. I strongly object that Tring is expected to play such a large role in the growth of housing in the borough, especially considering that much of this is proposed for green-belt land. If the housing was shared more proportionately across the borough then this would reduce the impact on green-belt land and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision for Tring delivers a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. There is not enough justification given for such a significant use of green-belt land or enough evidence given that the impacts will be mitigated. Any development in this site would dramatically change and, therefore, damage the green belt and Area of Outstanding Natural Beauty. I strongly believe that the housing actually needed within the area could be reasonably delivered within the current boundaries of Tring if a better mix of affordable housing was included (which is needed much more than non-affordable housing in this area).

Open spaces and sports facilities should, indeed, be included in any plans, but this should not be done at the detriment of the local green belt and countryside, especially the Area of Outstanding Natural Beauty. Consideration should be given to how these can be delivered in their own right instead of such facilities being packaged into a wider growth strategy that includes provision of inappropriate housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2739

**Person ID**

1263270

**Full Name**

James Thornton

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2754

**Person ID**

1262722

**Full Name**

Colin McCready

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	I believe the scale of growth is unsustainable and driven on demand signals pre covid. The sheer volume of new dwellings are disproportionate to the ability to invest in the required infrastructure, as all the available space (and then some) will be developed for housing.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2802
<b>Person ID</b>	1263287
<b>Full Name</b>	Jeremy Bonnar
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p>

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2813

**Person ID**

1263293

<b>Full Name</b>	Marco Rabbini
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Vision concentrates too heavily on just building houses on green belt land. With talk of expansion to the local infrastructure post the development of houses - the infrastructure should be in place first or near on complete i.e. larger parking at Stations or town centres, Tring Station is already over subscribed. Station Road from Tring or to aldbury needs improvement to reduce car use in the winter months it is not suitable for use when dark by either walkers or cyclists currently unsafe carbon free travel. New housing on brownfield sites should be prioritised to our local builders. Allow for the occupancy of these and develop the infrastructure along side. Housing is the easy part to make money and tick the box of growth in the short term but in the long term has a negative impact. There should be a stop/ hold on the number of houses until comparable infrastructure to support these homes i.e. jobs, schools, parking is expanded. The large scale use of green belt to just build houses cannot be allowed to take over and cannot be justified in our current post covid lives and climate change world. There has to be a further justification of the expansion (not just proposed plans and written words) but actual improvements in the wider community before houses can be built. I fear too many houses on the green belt land with local improvements running alongside will destroy the community. Morally the current plan is wrong!
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2835
<b>Person ID</b>	1263016
<b>Full Name</b>	Joanna Brown
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

<b>* No</b>	
<b>Comment</b>	<p>The Local plan has been written in accordance with current Govt guidance which dates from 2014. It fails to take into account the recommendations of the National Planning Policy Framework (NPPF) which expects Dacorum to use the most recent and up-to-date information which is from 2018. ONS projections based on 2018 data indicate an annual need for around 350 dwellings per annum. This is substantially fewer dwellings than the current plan proposes. DBC should challenge the proposed numbers which represent over -development and huge impact on AONB and are based on outdated (2014) housing projections.</p> <p>The result is 5,954 homes will be in "greenfield growth areas" known as Green Belt and most of it on the outskirts of Berkhamsted. 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, therefore I find the Council's proposals neither justifiable or sustainable.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2848
<b>Person ID</b>	1012318
<b>Full Name</b>	Mrs Jane Hennell
<b>Organisation</b>	Area Planner Canal and River Trust
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
<b>* Yes</b>	
<b>* No</b>	
<b>Comment</b>	<p>We are pleased to note that the Grand Union Canal is recognised as a special feature playing and active part in the heritage of the borough and that the wider historic environment is valued and protected. Perhaps the Canal and Tring Reservoirs could be referred to in the infographic at para 2.29?</p> <p>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> <p>1 improving the physical environment, opportunities for people and the wider economy</p>

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.

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 whilst supporting its ability to deliver economic, social and environmental benefits to local communities and secure the long-term sustainability of the canal corridors.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2865

**Person ID**

1263425

**Full Name**

Andrew Farrow

**Organisation**

Nettleden with Potten End Parish Council

**Agent ID**

1253616

**Agent Full Name**

Andrew  
Farrow

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**The consultation process**

We appreciate the fact that the consultation period was extended, although this should have been agreed at the outset rather than imposing a significant workload during a national lockdown and over the Christmas holidays which self-evidently were always going to make it extremely difficult both to give the plan the attention it deserved and to undertake adequate public consultation.

However we are still extremely concerned that the consultation has proceeded given that:

-shortly after publication the Government changed its guidance on the level of housing growth required by the Borough, a key driver of the plan, and it now appears that the Borough is adopting a housing growth figure which is not consistent with the Government’s express intent to protect Green Belt land.

-it is very difficult to understand how the majority of the proposed major developments can be described as “sustainable” given their distance from existing infrastructure.

-neither the Infrastructure Development Plan nor the Transport Plan are complete and under the current process it will not be possible to comment in any meaningful way on the Plan without the benefit of these significant elements.

-many of our parishioners have yet to receive the Plan Summary.

Nettleden with Potten End Parish Council has a particular interest in the proposals which see traffic from the significantly expanded Berkhamsted and Tring routed to the M1 via a new link road running through The Hemel Garden Community but with no detail of how that traffic gets from the A41 to the start of the new road at the B440, given that the only available routes in the absence of new roads are either through the middle of Potten End or via an implausible route around three sides of Hemel Hempstead.

The Parish Council is also concerned that:

-The proposals take insufficient account of previously identified urban capacity before building on the Green Belt.

-The sustainability analysis is misleadingly only based on land available for development rather than providing a benchmark against the ideal sites.

-The plan doesn't include any commitment to invest in the infrastructure necessary for small villages and hamlets in the Borough to prosper.

-Whilst protecting the small villages and hamlets from housing development, the Plan is silent on protecting them from increased traffic; indeed it seems that the intention is to re-route traffic from Hemel Hempstead in particular through the small villages.

The Plan does not meet the needs of our community and its ambitions will undermine the quality of life of our residents. We urge the Council to suspend the consultation process, to consult with the Government to obtain clarity on the appropriate housing target, and to re-submit the Plan for a further Regulation 18 consultation once the housing target is finalised and other key elements of the plan are completed.

### **National Policy Reforms**

We sympathise with the problem of producing a plan against the background of proposed changes to the national policy framework, but given that uncertainty the Plan cannot afford to have any ambiguity about its relationship with that framework. For example, in the introduction to the main Plan document it states (1.8):

“Although it is unclear how the Government will respond to the consultation [regarding the white papers on Planning for the Future and Changes to the current planning system] we have already taken some steps to reflect some of the proposals. These included ... introducing the simplified zoning categories”.

But in the section dealing with National Policy reforms (14.8) there is no reference to the impact of zones, and in the Green Belt and Rural Area Topic Paper it states (s2.27):

“This [Planning] White Paper seeks to introduce a number of planning reforms to the planning system in England, please note these are only proposals to be aware of and they do not apply to this current Local Plan consultation that is taking place from November 2020 to February 2021”.

We assume that the main Plan document takes precedence and that the intent is to adopt the three zone approach outlined in the White Paper, but if this is the case we are concerned that:

- given the uncertainty around house targets (see below) there is no clarity about what might happen were the plan to be adopted but the housing target reduced, since our understanding of the white paper proposals are that once an area is defined as a growth zone in an adopted local plan there is in principle agreement for the location, use, and amount of development on a site.
- there is no clarity about what might happen to the growth zones identified in the Plan if the amount of windfall housing exceeds the 2,400 estimated in the sources of housing land supply. Given that we are already aware of two proposed developments totalling 1,500 houses (21/00171/SCE 400 houses along Leighton Buzzard Rd and 1,100 homes in the Bulbourne Cross development near Berkhamsted) which don't feature on land identified for growth in the Plan this appears to be highly likely.
- there is virtually no reference in the Plan to protection zones.

The decision by the Government to withdraw some of the proposals in the White Paper only months after it was published amply highlight the risks of building a plan on a consultation paper.

We believe that it is inappropriate to base the Plan around the three zone approach until this is a statutory requirement.

### **Use of Green Belt land**

The Plan calls for significant development on Green Belt land but is silent on the full extent of that development which has been estimated by CPRE at 746 hectares. The use of Green Belt land is contrary to the wishes of our community as was overwhelmingly expressed in the responses to the 2017 consultation where nearly 95% of respondents didn't agree with the proposed approach to Green Belt and Major Development sites. It is clear from Cllr Williams' letter of 30th November 2020 to the Secretary of State that the Borough Council recognises that the same concerns are likely to arise again from the current consultation.

Development on Green Belt land also runs counter to the Government's response to the local housing need proposals of 16th December 2020 in which it stated

*"... that 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".*

We also understand that one of the reasons that the Inspectors halted the Public Examination of the St Albans Local Plan was its over-reliance on a few very large strategic Green Belt allocations. Finally we see insufficient evidence that Dacorum has looked widely enough to meet its housing commitments from less sensitive, more sustainable, sites.

The National Planning Policy Framework requires that the demonstrable benefit of the proposed release of Green Belt land outweighs the adverse impact of building on it. We dispute the assumption in the Plan that this hurdle has been met.

### **Housing needs assessment**

We note that since publication of the Plan the Government has revised its method of housing needs calculation but we oppose its proposal to revert to using out of date data from 2014 which result in an increase in the target for housing needs in Dacorum (and Hertfordshire as a whole).

We cannot support using a housing needs methodology that is not based on up to date demographic and housing data, in this case the 2018 ONS data, and doesn't take sufficient account of Green Belt and AONB constraints; we fully support the request in Cllr William's letter of 30th November 2020 that greater weight be placed on these constraints.

We also note that on the 16th December 2020 the Minister stated that the Ministry's projected house building numbers are not a target which in the context of those remarks we understand to mean that more weight will be given to Green Belt constraints.

Given that the Government has withdrawn the housing needs methodology on which the Plan is based, that the revised methodology uses out of date data, and that the Government has stated that its projected building numbers are not a target, why has the Plan not been withdrawn until there is some clarity of what Dacorum's housing need is?

### **Transport and Movement**

We support the Plan objective (2.13) that "new development needs to be located in places which have excellent access to jobs, shops, services and can quickly and easily be reached by sustainable public transport and benefit from high quality walking and cycling infrastructure", but this is completely at odds with the proposed major development sites.

We have particular concerns:

- that in practice the prime consideration in site selection appears to be land availability rather than appropriateness or sustainability (Site Selection Topic Paper 2.35).
- that the Council is still "continuing to develop the transport proposals that will be included within the Plan" (21.18), providing only limited evidence as to how sustainable public transport will be delivered.
- about the implications of the new transport corridor to the north of Hemel Hempstead (10.4 & 21.17) on traffic through Berkhamsted, Potten End and Great Gaddesden Parish.
- that the need to develop sustainable transport options for rural settlements seems to exclude settlements not identified for growth in the Plan (21.16).

This is supposed to be our only opportunity to have a meaningful input to the Plan, and the transport infrastructure to support a planned 25% increase in population is clearly key to understanding how the Plan can be sustainable. We cannot support a Plan without access to the details of the transport plans which underpin it.

### **Infrastructure**

Clearly when considering a proposed 25% increase in population the provision of adequate infrastructure is key, but there are only three pages about infrastructure development in the Plan (pp 49 – 52). The draft Infrastructure Development Plan (IDP) is available but will continue to be developed (10.5) and as a result it is difficult to know what reliance to place upon it. The Council itself recognises that:

“The IDP is also a key tool in the assessment of development viability, which the Council is continuing to develop to ensure that the required infrastructure can be delivered and development remains viable.” (10.5)

We are also concerned that, as with transport, improvements to the Borough’s digital network appear to be limited to new development (21.50) making it harder to sustain existing smaller villages.

This is supposed to be our only opportunity to have meaningful input to the Plan. We cannot support a Plan without the details of the infrastructure development that will underpin it.

### **Natural Environment**

With the underlying chalk aquifer already assessed as being “over-abstracted” we have concerns over the ability of the water supply to be able to accommodate the needs of a 25% population expansion without impacting the natural environment.

### **Overarching Vision**

The main problem with the Vision is not what it says, but what it leaves unsaid; no-where in the Plan does it state that the Vision is to build on 746 ha of Green Belt land up to the edge of the AONB. To represent the Hemel Garden Communities programme involving a development of 5,800 new houses as “delivering new ... green spaces” (p23) when it involves building on 372ha of the Green Belt is quite simply a gross misrepresentation.

The Vision is also silent on the support to be provided to the surrounding small villages and hamlets. Improved digital connectivity and sustainable transport in so far as it is possible to tell from the incomplete work in those areas appear to be initiatives limited to the localities which will see housing development. The objective should be for all residents of Dacorum to benefit to ensure the sustainability of those smaller communities.

The Vision commits that smaller villages will be “protected from development” but is silent on the impact on those villages of increased traffic flows which are an integral part of the Plan. There should be a commitment to protect smaller villages from increased traffic flows.

The Plan does not meet the needs of our communities and its ambitions will undermine the quality of life of our residents both through the loss of open space and a failure to commit to invest.

It is not our Vision for the future of Dacorum.

#### **Included files**

#### **Consultation Point**

Borough Vision to 2038

#### **Comment ID**

EGS2887

#### **Person ID**

1263430

#### **Full Name**

Pru Murray

#### **Organisation**

#### **Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>I think the vision focuses too heavily on theme 1 - providing homes with much less consideration given to 2-5 which are barely mentioned in the document. Where is the plan for a vibrant economy - it all seems to be focused on homes. Where are the new employment opportunities for future residents? Why are we eating into green belt land which people are enjoying considerably during the pandemic? How is building a huge volume of new homes going to create a cleaner, greener borough especially as hard to increase existing transport networks - particularly in somewhere like Berkhamsted. Where are the cycling paths?</p> <p>I think the pandemic may mean we will have different work and leisure patterns in the future - less commuting, more working from home, more local focus so there should be an urgent review of the entire local plan given our current situation.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2890
<b>Person ID</b>	1258862
<b>Full Name</b>	Tim Beeby
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>If you take the Vision at face value it's probably one that most people would want. However the Plan doesn't describe how that vision would be achieved and concentrates almost exclusively on how many homes will be built and where they would be.</p> <p>The proposed number of new housing is unnecessarily high partly because the numbers are based on out of date figures.</p>

Growth in housing should be accompanied by growth in employment otherwise it becomes incompatible with the desire to reduce carbon emissions through reductions in personal vehicle journeys.

Berkhamsted has an increase of 2200 houses with no provision for increasing local employment. With most of the housing being build along the top most will not walk or cycle.

Development should be predominately concentrated around Hemel as the natural centre of local employment, transport hub, civic amenities etc

Growth proposed for Berko & Tring is out of proportion to their current size and do not take into account their geographical constraints.

Green Belt land should only be developed in exceptional circumstances and the case for exceptional circumstances has not been made.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2891

**Person ID**

1263431

**Full Name**

Bethan Chamberlain

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I have several reasons for being opposed to this plan:

- Road congestion and safety particularly on Granville Road, Bell Lane and Darrs Lane.
- The safety of children travelling to and from school
- Increase in noise and air pollution directly impacting the health and well being of local residents
- Loss of habitat for wildlife in particular nesting owls and bats, in mature trees on the land.
- The housing numbers in the Local Plan across Dacorum, and therefore Berkhamsted are excessive and wrong. They are well and above the forecast housing need for the Borough as calculated by the ONS.

- The impact on West Berkhamsted is disproportionate , does not consider any recent major developments in the area (Bearroc) and severely impacts infrastructure (roads, schools, doctors surgeries)
- During my many years of living in Berkhamsted and walking in the area there have been several sink holes that have appeared on the propped site between Bell Lane and Darrs lane- this raises serious concerns for new build resident's safety and ability to obtain sufficient insurance.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS2895

**Person ID**

1263434

**Full Name**

Lewis Chamberlain

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

There are so many reasons for objecting to this plan:

- Road congestion and safety particularly on Granville Road, Bell Lane and Darrs Lane.
- The safety of children travelling to and from school
- Increase in noise and air pollution directly impacting the health and well being of local residents
- Loss of habitat for wildlife in particular nesting owls and bats, in mature trees on the land.
- The housing numbers in the Local Plan across Dacorum, and therefore Berkhamsted are excessive and wrong. They are well and above the forecast housing need for the Borough as calculated by the ONS.
- The impact on West Berkhamsted is disproportionate , does not consider any recent major developments in the area (Bearroc) and severely impacts infrastructure (roads, schools, doctors surgeries)
- During my many years of living in Berkhamsted and walking in the area there have been several sink holes that have appeared on the propped site between Bell Lane and Darrs lane- this raises serious concerns for new build resident's safety and ability to obtain sufficient insurance

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS2900
<b>Person ID</b>	1262892
<b>Full Name</b>	Jean Farrer
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I can't agree with your vision and objectives, which, of course, sound ideal, but are fundamentally incompatible and undeliverable by your Plan.</p> <p>The Core Strategy in 2013 accepted the maintenance of the historic settlements of Berkhamsted and Northchurch as having 'strong valley and linear character and argued against building on the ridges of the valley. This commitment seems to have been abandoned but, in my view, should still inform your approach to development in this area.</p> <p>If implemented, Berkhamsted will have a 24% increase in houses (Northchurch 500 and Berkhamsted 1700), Tring will increase by 55% – this is quite a disproportionate burden for these market towns to take. They will lose their character and the development on this scale will damage their considerable contribution to the quality of life in Dacorum.</p> <p>I strongly object to your overstatement of housing need for Dacorum as a whole and the disproportionate burden for Berkhamsted, Northchurch and Tring.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2904
<b>Person ID</b>	1263377
<b>Full Name</b>	Jane Messenger
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Comment</b>	Whilst we need to grow and prosper as a town, the scale of the development of the new homes and the wider impact of increase of the population is too much.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2919
<b>Person ID</b>	1263440
<b>Full Name</b>	J Davies
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
Yes / No	
* Yes	
* No	
<b>Comment</b>	<p>The overarching vision refers to "open spaces", but unfortunately, they are often not always delivered within the true meaning. They may be publicly accessible, but are often surrounded by housing or commercial development (in part to fund their maintenance). Many people love the area because of the truly open areas of countryside. Whilst development is of course necessary, adding large swathes of development to the perimeters of our towns, distances many of those residents from the countryside. For example, the proposed developments to the north east of Tring or the north and east of Hemel Hempstead will materially change the character and environment of those areas.</p> <p>The proposed protection afforded to The Countryside and other small villages, whilst admirable, needs to be balanced with the impact elsewhere. Small pockets of development across all areas would surely offer an increase in diversity of provision and residents, thus supporting a more diverse and balanced economy.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2940
<b>Person ID</b>	1263445

<b>Full Name</b>	Andrew Farrow
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Dacorum's Vision emphasises environmental sustainability, but fails to mention that the cost of delivering it is a 25% increase in houses and population and the <u>loss of 2,000 acres of Green Belt and open spaces</u> across the Borough. The Vision highlights the potential for Hemel Garden Communities to deliver "... green spaces ..." but fails to mention that this comes at the cost of over 900 acres of Green Belt land.</p> <p>Tell me that Dacorum's vision is that we're going to help meet justifiable housing need, save the planet, and increase public accessability but we need to use some green belt land in the process and I'm more likely to be convinced.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2957
<b>Person ID</b>	1263439
<b>Full Name</b>	Rod Gibberd
<b>Organisation</b>	Tring School
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<i>Placing housing near to the station in Tring will be of greater benefit than trying to squeeze more in around the A41.</i>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS2968
<b>Person ID</b>	1164709
<b>Full Name</b>	Dianne Pilkington
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate</p> <p>Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

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The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2978
<b>Person ID</b>	1258924
<b>Full Name</b>	Natalia Maghdoori
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

## Comment

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

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<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS2981
<b>Person ID</b>	1263478
<b>Full Name</b>	ELIZABETH RAILTON
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	These seem broadly right but there up is a significant disconnect between the vision and objectives and the development strategy.
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3006
<b>Person ID</b>	1261190
<b>Full Name</b>	Neil Harwood
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Two key Local Plan objectives are stated as the following:</p> <ul style="list-style-type: none"> <li>- Conserving and protecting the natural environment; and</li> <li>- Mitigating and adapting to climate change (including the Borough's declaration of a climate emergency)</li> </ul> <p>The location (on greenfield land, green belt, and interface with AONB) and the extent (scale) of proposed development conflicts with both of these objectives of the Plan and means that they cannot be achieved under current proposals.</p> <p>If such key objectives are included within Plan, some clearer indication and evidence as to how they can be met must be provided.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3040
<b>Person ID</b>	1146084
<b>Full Name</b>	Mr Jason Parr
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

<b>* No</b>	
<b>Comment</b>	<p>Over-provision of housing based on inaccurate and superseded data</p> <p>I believe the council's vision is flawed as it is based on out of date ONS data which has led to a significant over-estimate of Dacorum's housing needs. Please see my comments for Question 7. Put simply, the predicted levels of growth and hence yearly targets for associated housing development are too high.</p> <p>Climate Emergency Issues</p> <p>Dacorum Borough Council has declared a climate emergency and indicated that this should be a central pillar in any future plans for the borough. This local plan vision as published prioritises economic growth and greenfield land development over considerations for the climate emergency. 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.</p> <p>Protecting Green Belt land &amp; 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> <p>Berkhamsted &amp; Tring Developments</p> <p>The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3071
<b>Person ID</b>	1263457
<b>Full Name</b>	Matthew Deane
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Comment</b>	It is a plan that is orientated primarily towards provision of housing, not one that really engages with the fundamental issues we are dealing with now or in the future. There is a lack of clarity about how towns' such as Tring will have been enhanced, other than being enlarged. There is a lack of recognition of the pressure these Towns are already under following years of infilling and underinvestment in amenities. This is evidenced by the cut and paste approach to the plans for Berkhamsted, Tring and Hemel
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3074
<b>Person ID</b>	1263499
<b>Full Name</b>	Mrs Angela Burgin
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p>

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the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3094

**Person ID**

1263498

**Full Name**

Peter Reynolds

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The current Covid-19 Pandemic is an exceptional issue that should be considered and translated into the planning for Dacorum in the short and medium term. There is an opportunity to promote local growth that improves welfare for local residents that are likely to travel less into London and the surrounding working areas. Adding significant numbers to the community will apply excessive stress to the local recreational welfare infrastructure that has seen massive increases this past year.

The opportunity to utilise "Brown Field" sites for residential use will undoubtedly increase and repurposing retail for to encourage working closer to home will have a fundamental change to the way most commuter type residents work. High density homes without having outdoor spaces close will encourage more traffic and congestion around the Ashridge Estate and other local open spaces that are not managed for high vehicle usage. Therefore, the use of some 850 hectares of Green Belt is inappropriate having regard to the proximity of areas allocated for housing to the Chilterns AONB. Dacorum BC should make use of exceptions to the target housing figures if meeting the target adversely impacts the Green Belt and the Chilterns AONB.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS3107
<b>Person ID</b>	1261485
<b>Full Name</b>	Douglas Adams
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I do not think that the vision has considered the impact of Covid or Brexit sufficiently.</p> <p>Brexit will impact on the extent of influx of expanding population.</p> <p>Whilst it is hard to assess at this early stage, Covid will more that likely change working practices radically in that less office space will be needed. This therefore will lead to an excess of underutilised brownfield sites which should be utilised before greenbelt.</p> <p>Dacorum should be placing greenbelt and its protection as a much higher priority before converting into residential housing. Once redesignated, it cannot be reclaimed. National Planning policy clearly sets out the rationale and reads "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>Dacorum clearly wishes to ignore National Planning policy.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3119
<b>Person ID</b>	1263514
<b>Full Name</b>	SAM LETHEREN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the</p>

sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3129

**Person ID**

1263515

**Full Name**

Irene Petts

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

<b>Comment</b>	I strongly disagree with the Local Plan and the housing numbers proposed.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3140
<b>Person ID</b>	1263526
<b>Full Name</b>	MR NICK RIPPER
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt. Urban areas make best use of the existing infrastructure that is already in place, for example schools, shops and medical services. Further, urban centres provide better access to sustainable forms of transport thereby assisting with meeting our national climate change targets.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel</p>

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This level of growth in such beautiful areas would fundamentally and irreversibly damage the character of our beautiful market town. My main concern is however that we should actually be re-wilding and protecting areas where wildlife can live. These fields to the east of town are full of wildlife, deer, hedgehogs, bats, frogs, newts to name but a few.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3164

**Person ID**

1263537

**Full Name**

MRS SARAH RIPPER

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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This level of growth in such beautiful areas would fundamentally and irreversibly damage the character of our beautiful market town. My main concern is however that we should actually be re-wilding and protecting areas where wildlife can live. These fields to the east of town are full of wildlife, deer, hedgehogs, bats, frogs, newts to name but a few.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should

be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS3203

**Person ID** 1263568

**Full Name** Mrs Suzy Hudson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS3206

**Person ID** 1263566

**Full Name** Frances Read

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	the housing target is far too high and will destroy yet more areas of Dacorum after relentless housebuilding over the past years
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3250
<b>Person ID</b>	1155396
<b>Full Name</b>	Jane Hodgson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p>

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to

the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3342

**Person ID**

1263652

**Full Name**

Andrew Lunn

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I believe the plans will have a very big detemental affect on the local communities, i live in Northchurch and it such a historical place and no consideration is being goven to tis. It will bring a lot more traffic thourgh the town and there is not the transport infrustructure in place.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3343

**Person ID**

1263658

**Full Name**

Nicola Egerton-king

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

* Yes	
* No	
<b>Comment</b>	The character of market towns such as Tring and Berkhamsted eill be destroyed by such growth. A few cycle paths will not compensate
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3357
<b>Person ID</b>	1263693
<b>Full Name</b>	Ruth Colderwood
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	I think too much green belt land or just green spaces not necessarily in the green belt are being used.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3369
<b>Person ID</b>	1263702
<b>Full Name</b>	Ian Edwards
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	

* No	
Comment	I believe overall that the basis of the plan is both out of date (pre-COVID19 impacts) and flawed (based on previous Govt. guidelines). I feel that the growth proposed for Tring is totally disproportionate to both the existing town but also its' capacity to accommodate such a drastic increase in population. Whilst I can appreciate the need to provide more housing, I seriously doubt that the planned housing in Tring would be remotely affordable!
Included files	
Consultation Point	Borough Vision to 2038
Comment ID	EGS3397
Person ID	1263763
Full Name	Adam Kindred
Organisation	CBRE
Agent ID	1263757
Agent Full Name	Adam Kindred
Agent Organisation	
Yes / No * Yes * No	Yes
Comment	<p><b><u>Overarching Vision</u></b></p> <p>We have no comments on the 'Overarching Vision for Dacorum's Growth by 2038' which reads as an appropriate set of principles to guide development in Dacorum.</p> <p><b><u>Vision for Dacorum's Places</u></b></p> <p>With respect to the 'Vision for Dacorum's Places' this under-represents the role that Kings Langley can play in delivering sustainable growth. Kings Langley is grouped alongside Bovingdon and Markyate in the spatial strategy, neither of which have rail stations. Functionally, Kings Langley is 9 minutes on a direct train route into the principal settlement of Hemel Hempstead and this should be more appropriately reflected in the vision, aims and objectives for Kings Langley.</p> <p>As noted in the October 2017 Settlement Profiles from Travel to Work data, 15.7% of trips of people living in Kings Langley are made by public transport. This is materially higher than both Bovingdon and Markyate at circa 10%. Incidentally, the figure for Kings Langley is also higher than the figure for Tring.</p> <p>The distinction between Kings Langley and Bovingdon and Markyate is further highlighted in the Council's own evidence with Paragraph 2.30 of the Development Strategy Paper (2020) stating '<i>However, unlike Bovingdon and Markyate, it</i></p>

[referring to Kings Langley] *does have its own secondary school, and access to a mainline railway station and reasonable levels of local employment.*'

The attractiveness of Kings Langley as a location for employment is further highlighted in the Employment Land Review (October 2017) in which it is stated that total office stock in Kings Langley is 33,000 sqm, with EGi reporting that there is just 200 sqm currently available. The amount of employment floorspace in Kings Langley is significantly greater than that at Bovingdon or Markyate.

The Sustainability Appraisal November (2020) states '*Option Cii considers higher growth at the villages of Bovingdon and Kings Langley, building upon their strengths as having a larger range of local services and facilities when compared to Markyate, and also that Kings Langley has better access to public transport.*' Whilst this is acknowledged in the evidence it is not reflected in the approach to housing allocations in the Large Villages.

### **Strategic Objectives**

The first theme of the Strategic Objectives is to '*deliver the identified housing requirement between 2020 and 2038.*' The launch of the consultation in November 2020 pre-dates the Government's response to the proposed changes to the Standard Methodology (December 2020). The response from the Government confirms that the annual housing target for Dacorum should be 1,023pa. The Strategic Objectives as set out in the Draft Local Plan are based on the lower number consulted on (922pa) and thus will need to be increased to 1,023pa to respond to the outcome of the consultation.

Ensuring that the Strategic Objectives are based on the figure of the Standard Methodology is a key requirement of soundness in presenting a positively prepared approach to the Draft Local Plan. Paragraph 60 of the NPPF (2019) is clear that an alternative approach to determining the minimum number of homes needed should only be used in exceptional circumstances.

A further strand of the Strategic Objectives is to '*strengthen Hemel Hempstead's role as a thriving business centre.*' Whilst it is appropriate that Hemel Hempstead will absorb the highest amount of growth as Dacorum's principal settlement, in delivering the aim to strengthen Hemel Hempstead's role as a thriving business centre it is important that a range of housing is provided to retain and attract talent. Key amongst this is working professional families who, whilst needing to be located close to Hemel Hempstead, require a housing typology as opposed to flatted developments. Locations such as Hill Farm in Kings Langley, in being located in close proximity to existing schools, are well placed to provide housing to respond to this need and contribute to wider aims to strengthen Hemel Hempstead's role.

A final key strand of the Strategic Objectives is to '*To promote the use of renewable resources, reduce carbon emissions, protect natural resources and reduce waste.*' Arguably the most significant natural resource within Dacorum is the Chiltern Beechwoods Site of Special Scientific Interest (SSSI) and, specifically, Ashridge Commons and Woods SSSI.

Work undertaken as part of the Chiltern Beechwoods Topic Paper (2020) confirms that engagement with Natural England to date has confirmed that recreational pressure and air quality impacts are the greatest threat to the asset. Visitor surveys that have been undertaken at Ashridge Commons and Woods SSSI confirms '*approximately 19% of total visits, taking account of frequency of visits, were from Hemel Hempstead. 32% of total visits were from Berkhamsted, with 6% from Tring.*'

As set out in Paragraph 4.34 of the Topic Paper it is further stated that *‘National Trust expect these percentages to be a minimum estimation of the number of visitors from Dacorum, as it does not assess all of the 24 car parks they have on site, especially those located closer to the settlements of Northchurch and Berkhamsted. In these locations, there is an expectation that most visitors are from the local area who know these smaller, local car parks or the ‘quieter areas’ of the site.’*

From the above data it is clear that a significant amount of the recreational pressure arises from Hemel Hempstead, Berkhamsted and Tring, with Kings Langley located furthest away from the SSSI.

From the Development Strategy Paper (November 2020) it is noted:

*‘Following discussions with Natural England, they have identified ‘long term wear and tear issues on the site’ and agreed that likely significant effects could not be ruled out for recreational pressure or air quality on the Chilterns Beechwoods SAC. Therefore they advise that a precautionary approach should be adopted.’*

Paragraph 174(a) of the NPPF (2019) is clear 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, including the hierarchy of international, national and locally designated sites of importance for biodiversity’.*

With Ashridge Commons and Woods SSSI susceptible to recreational pressures as a result of housing development, it is a key consideration to ensure that the spatial strategy for the Draft Local Plan embeds this into its approach. A key question asked of Paragraph 32 of the NPPF (2019) is whether or not adverse impacts can be avoided and, if not, how they are mitigated. This is consistent with the approach being advocated by Natural England that a precautionary approach should be adopted.

In the preparation of a sound plan that is consistent with the NPPF, it is necessary for the spatial strategy to appropriately respond to relieving recreational pressure on the SSSI. Kings Langley is located as the settlement furthest away from the SSSI and does not appear in the visitor surveys as a major ‘starting point’ for trips made to the SSSI (see Page 106 of Chilterns Beechwood SAC – Summary of Evidence 2020).

The increase in housing in Kings Langley, on appropriate sites, is needed to ensure a sound approach to the spatial strategy in relieving the pressure generated from significant development sites in Tring and Berkhamsted. Such a position would have been needed irrespective of the change in the Standard Methodology consultation, but it is now further reinforced that the sites needed to ‘plug the gap’ should be focused in those areas a greatest distance from the SSSI.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3481

**Person ID**

1263805

**Full Name**

Andrew Criddle

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The Plan states: "1.32 We have also engaged with a variety of other organisations, including Hertfordshire County Council, Highways England, Natural England, the Chilterns Conservation Board, Historic England and the Environment Agency."</p> <p><i>Comment in response: There is no mention of consultation with Buckinghamshire, Aylesbury Vale or Bedfordshire Councils, despite the fact that Dacorum (and most notably Tring )borders all three. There is also vast expansion of housing planned for Aylesbury Vale especially in Aston Clinton, Weston Turville and Halton which are all very adjacent to Tring and will place an inordinate strain on resources and infrastructure. For example Tring’s population are serviced by Stoke Mandeville Hospital but there are no plans to increase hospital capacity either Aylesbury Vale or in Dacorum (where the hospital is actually being downsized) to meet the massive increase in populations proposed for both Boroughs. Significant consultation with Aylesbury Vale on infrastructure planning is therefore imperative, especially to plan for increased medical and hospital services.</i></p> <p><i>Further comment:</i> <i>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more where green belt is less affected.</i></p> <p><i>Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Area of Outstanding Natural Beauty.</i></p> <p><i>I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and with significantly less encroachment onto green belt.</i></p> <p><i>The delivery of open space and sports and leisure facilities should be encouraged, Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities where they can integrate effectively with and enable the expansion of existing facilities and well run local clubs – who can then use and manage those facilities sustainably and in line with local needs.</i></p> <p><i>Any Vision which requires development on 746 ha of Green Belt land is contrary to the wishes of our communities as was overwhelmingly expressed in the responses to the 2017 consultation where nearly 95% of respondents didn’t agree with the proposed approach to Green Belt and Major Development sites. It is clear from your letter of 30th November</i></p>

*2020 to the Secretary of State that the Borough Council recognises that the same concerns are likely to arise again from the current Plan.*

*Development on Green Belt land runs counter to the Government's response to the local housing need proposals of 16th December 2020 in which it stated "... that 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".*

*Sympathetic development on a limited amount of green belt land and in numbers sustainable by the town might be acceptable – especially if combined with much needed infrastructure improvement including significant extra land allocated for additional sporting facilities and expansion of existing sports clubs.*

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3491

**Person ID**

1263810

**Full Name**

David Tolfree

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3512

**Person ID**

1263824

**Full Name**

Nichola Criddle

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The Plan states: 1.32 We have also engaged with a variety of other organisations, including Hertfordshire County Council, Highways England, Natural England, the Chilterns Conservation Board, Historic England and the Environment Agency.</p> <p><i>Comment in response: There is no mention of consultation with Buckinghamshire, Aylesbury Vale or Bedfordshire Councils, despite the fact that Dacorum (and most notably Tring )borders all three. There is also vast expansion of housing planned for Aylesbury Vale especially in Aston Clinton, Weston Turville and Halton which are all very adjacent to Tring and will place an inordinate strain on resources and infrastructure. For example Tring’s population are serviced by Stoke Mandeville Hospital but there are no plans to increase hospital capacity either Aylesbury Vale or in Dacorum (where the hospital is actually being downsized) to meet the massive increase in populations proposed for both Boroughs. Significant consultation with Aylesbury Vale on infrastructure planning is therefore imperative, especially to plan for increased medical and hospital services.</i></p> <p><i>Further comment:</i> <i>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more where green belt is less affected.</i></p> <p><i>Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Area of Outstanding Natural Beauty.</i></p> <p><i>I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and with significantly less encroachment onto green belt.</i></p> <p><i>The delivery of open space and sports and leisure facilities should be encouraged, Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities where they can integrate effectively with and enable the expansion of existing facilities and well run local clubs – who can then use and manage those facilities sustainably and in line with local needs.</i></p> <p><i>Any Vision which requires development on 746 ha of Green Belt land is contrary to the wishes of our communities as was overwhelmingly expressed in the responses to the 2017 consultation where nearly 95% of respondents didn’t agree with the proposed approach to Green Belt and Major Development sites. It is clear from your letter of 30th November</i></p>

*2020 to the Secretary of State that the Borough Council recognises that the same concerns are likely to arise again from the current Plan.*

*Development on Green Belt land runs counter to the Government's response to the local housing need proposals of 16th December 2020 in which it stated "... that 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".*

*Sympathetic development on a limited amount of green belt land and in numbers sustainable by the town might be acceptable – especially if combined with much needed infrastructure improvement including significant extra land allocated for additional sporting facilities and expansion of existing sports clubs.*

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3521

**Person ID**

1263821

**Full Name**

Anne Isherwood

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The target of 17,000 houses is excessive compared to previous estimates for Dacorum. I believe the long term effects of the Covid 19 pandemic will lead to major changes in working, commuting and shopping habits which may well free up office and retail sites for housing within urban areas, reducing pressure on green belt and rural sites

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3523

**Person ID**

1263797

**Full Name**

Chloe Collins

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>Tring Rural Parish Council welcome the opportunity to contribute to Dacorum's New Draft Local Plan and Emerging Strategy for Growth 2020-2038.</p> <p>We are encouraged that the proposed policies maintain and support the current Settlement Hierachy with specific policies for Rural Areas and continue to recongnise 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.</p> <p>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.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3525
<b>Person ID</b>	1263468
<b>Full Name</b>	Bruce Day
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>In light of the identified constraints on and existing problems relating to infrastructure, the objectives/overview give the impression of responding to (potentially outdated) Government requirements for housing rather than an ideal programme for Dacorum. The declared housing plans for, particularly Tring and Berkhamsted, the national guidance requirement to respect the the intrinsic character and sustainability of the local area.As a result, there are too many contradictions within the draft plan, which I hope after submissions by residents will be revised.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3536
<b>Person ID</b>	1257698
<b>Full Name</b>	Peter Block
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Number of dwellings 'required' is highly contentious, increasing from 430 pa in the previous Local Plan to 922 pa in this; and in the context of the latest ONS projection of 350 pa in their latest assessment. It strikes me that the DBC figure is based on what might be achievable given no constraints such as green belt retention, infrastructure and enviromental.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3537
<b>Person ID</b>	1145631
<b>Full Name</b>	Mr Alastair Greene
<b>Organisation</b>	Clerk Little Gaddesden Parish Council
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	All ok apart from the scale of development overall which seems in excess of the number of homes required
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3584
<b>Person ID</b>	369415
<b>Full Name</b>	Mr Dacorum EnvironmentalForum
<b>Organisation</b>	Chair Dacorum Environmental Forum Waste Group
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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>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 aspirations.</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 <a href="http://dacenvforum.org.uk/">http://dacenvforum.org.uk/</a> and look under "Consultations etc."</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3587
<b>Person ID</b>	1263865

<b>Full Name</b>	Robin McMorran
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I am struggling to imagine how "Creating a clean, green and attractive Dacorum" is to be achieved by concreting over acres of green belt land and felling thousands of trees. This is nothing short of desecration of the countryside.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3630
<b>Person ID</b>	1263885
<b>Full Name</b>	Mr Neil Roberts
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p>

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS3648

**Person ID** 1263887

**Full Name** Atherton Powell

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

No

**Comment** The plan destroys the greenbelt. Why ruin what little we have left of the countryside when there are urban areas and brownfield land crying out for redevelopment.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS3650

**Person ID** 1263890

**Full Name** Chris Munday

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The vision fails to take account of the environment, fails to consider the nature of Dacorum as a place where people live, work and play. It is especially poor in defining the characteristics of Tring as an ancient market town with the Rothschild tradition. The approach to the Green Belt is aboherent
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3674
<b>Person ID</b>	1263916
<b>Full Name</b>	MARK TYLER
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<u>Incorrect Assumptions for Housing Provision</u> . Accepting that there is an undeniable need for more housing, in particular genuinely affordable housing, I have concerns regarding the enormous scale of proposed development of Dacorum. The Council appears not to have considered 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. 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. The Council will be aware 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:

- "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." and they went on to say "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."

Impact on Green Belt and Other Designated Land. The Council 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 evident that in meeting the declared mission to provide at least 100% of the over-inflated housing need, the Council proposes that, as a necessity, development must, therefore, take place on Green Belt land or land that is specially designated for other purposes. 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty; these are for many people the prime reasons that they have chosen to live in this area. I remind the Council of the stance of our local Member of Parliament, Gagan Mohindra, on Green Belt land, which was included in an email response to me dated 17 November 2020. This appears to set out the Council's duty to plan for housing provision and protect our Green Belt and specially designated land:

- "I stood on a platform of protecting the Green Belt and will continue to fight that battle on a national level. I have previously written to Minister Rt Hon Chris Pincher at MHCLG about my concerns. At a local level, we must as a community come together and agree a way to sustainably ensure new homes are built for local residents. The only way to do this is through Dacorum Borough Council finalising its Local Plan as soon as possible".

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3691
<b>Person ID</b>	1263908
<b>Full Name</b>	Thomas Burger
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	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?
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3706
<b>Person ID</b>	1263921
<b>Full Name</b>	sarah diehl
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	We do not need this many new homes in the area. The people moving in will not find work in the local area so will therefore increase the number of commuters using the trains into London. They are planning to build too many homes of the wrong sort in the area.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3712
<b>Person ID</b>	1260803
<b>Full Name</b>	Rollo Prendergast
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>Please advise in what respects the Draft Local Plan takes into account the recent statement by the Housing Secretary:</p> <ol style="list-style-type: none"> <li>1 In what way will you ensure that a lasting change will be brought about in the buildings and places we build?</li> <li>2 How will you ensure that young people and those on low incomes will be able to have the security and dignity of a home of their own?</li> <li>3 Do you believe that the Local Plan will ensure that buildings and places should be beautiful - popular design and the ability for local people to reject what they consider ugly?</li> <li>4 Are you going to enable the community to come together and produce design codes and guides of the kind that inspired great development of previous generations?</li> <li>5 How will you ensure that builders wishing to build in our area will abide by these rules?</li> <li>6 Do you intend to seek the advice of Nicholas Boys Smith and the Office for Place, to assist in asking residents what they actually want their neighbourhoods to look like?</li> <li>7 Do you subscribe to the aim for new communities: 'beautiful, neighbourly, sustainable, with nature and open space around us and rooted in local character and identity'?</li> </ol> <p><b>“Extract:</b></p> <p><b><i>Home should be a place where people can belong</i></b></p> <p><i>Robert Jenrick</i>  <i>Saturday January 30 2021, 12.01am, The Times</i>  <i>The late historian Kenneth Clark said in his documentary Civilisation that the task of a housing secretary was not the words a speech or the policies, but the buildings built in his or her time in office. Like the proverbial trees planted in whose shade one may never sit, the consequences of decisions made today will not be seen for some time but are likely to endure for a long time.</i>  <i>As we work hard to keep the housing market open, protect the millions of jobs that depend on it and sustain the numbers of homes we’ve built in recent years — we built more homes than any year since 1987 and save for Covid-19 would have reached levels not seen since Harold Macmillan sat at my desk — we are also setting out to build better. We should aspire to pass on our heritage and our unique built environment, not depleted but enhanced. To do that we need to bring about a lasting change in the buildings and places we build.</i></p>

*In recent decades some development has acquired a bad name due to shoddy workmanship, at times outright unsafe, and the development of “anywhere” places, which have little relevance or connection to local character or identity. These were arguments made by the late Sir Roger Scruton and Nicholas Boys Smith on their seminal report to the government last year, entitled Living With Beauty.*

*Life under the constraints imposed by the pandemic has surely validated their position. “People do not want their built environment to be a fragment of anywhere,” Sir Roger said, “it must be a place to which they can belong, where they can put down their roots and be side-by-side with neighbours.”*

*That is what we are setting out to achieve. I appreciate that careful design, place and the natural environment is seen by some to be in unresolvable conflict with our other clear objective to build more homes, which will enable more young people and those on low incomes the security and dignity of a home of their own.*

*Housing policy contains many tensions but this one is not entirely intractable and we owe it to everyone to try to bring these two powerful forces together in greater harmony.*

*This is the thinking behind our response, published today, to the recommendations made in Sir Roger’s report and reflected in the change we are making to the planning system as a result.*

*For the first time since its modern incarnation in 1947 we are embedding the principle that buildings and places should be beautiful, by which we mean locally — popular design and the ability for local people to reject what they consider ugly.*

*Communities will be asked to come together and produce design codes and guides, of the kind that inspired the great development of previous generations, from Bath to Bournville. Builders wishing to build in their areas will need to abide by these rules; indeed, in time, will find it faster and simpler to get permission if they clearly do follow them in letter and spirit.*

*We want to establish a new team of evangelists for this approach, led by the redoubtable Nicholas Boys Smith, to help commute the length and breadth of England to create these codes, called the Office for Place. They will help local councils ask residents what they actually want their neighbourhoods to look like.*

*And we are setting out to reinvigorate the tradition of civic tree-planting we still see in the leafy streets of our Edwardian and Victorian suburbs and new towns like the Welwyn Garden City. Through planning policy, every new street should be lined with trees, ensuring ready access to nature, with all the advantages to health and wellbeing that provides, for everyone.*

*We want to build a better country post-Covid, one with more and better homes, as a matter of social justice; and one where new developments are also new communities: beautiful, neighbourly, sustainable, with nature and open space around us and rooted in local character and identity.”*

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3741

**Person ID**

1263939

**Full Name**

Mr Richard Dawkins

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>While the overarching vision (Footnote 1: ‘overarching vision for Dacorum’s Growth by 2038’ p22: Draft Local Plan) articulates a positive view of the future, the first and third priorities (Footnote 2. Paragraph 3.5, p21: Draft Local Plan) are open-ended and need further qualification otherwise the strategy and policy statements that flow from the priorities risk causing deleterious impacts.</p> <p>The priorities should be updated as follows:</p> <ul style="list-style-type: none"> <li>• A clean safe and enjoyable environment that respects its historical character and safeguards nature</li> <li>• Building strong and vibrant communities</li> <li>• Ensuring economic growth and prosperity without damaging existing quality of life</li> <li>• Providing good quality, affordable homes, in particular for those most in need</li> <li>• Ensuring efficient, effective and modern service delivery</li> </ul> <p>The second point outlined in the Vision for Berkhamsted (Footnote 3. ‘The vision for dacorum’s places’ p23: Draft Local Plan) assumes the new neighbourhoods included within the proposed development to the south are delivered. Good practice would suggest that a strategy or a plan should not be included in a vision. Moreover, this consultation response recommends that one proposed site be removed from the south plan (see response to question 5). The words “to the south and the southwest of the town” should therefore be removed to avoid a presumption around how the vision should be delivered.</p> <p>I have no comments on the Strategic Objectives (Footnote 4. P25-26: Draft Local Plan)</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3813
<b>Person ID</b>	1144948
<b>Full Name</b>	Mr Peter Brown
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>It is difficult to decide where to start because the statement totally fails any reality check. The claim that 'The natural beauty of the Chiltern Hills and the varied character of the countryside will have been enhanced etc.' is simply not true when the intention is to concrete over a significant amount of Greenbelt?</p> <p>The vision is a sham as it pays no attention to the NPPF and makes no attempt to justify 'exceptional circumstances'. The sole intention is to build as many houses as possible and completely ignore the quality of life of current and future residents.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3817
<b>Person ID</b>	1263962
<b>Full Name</b>	Susie Alderson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>As a resident in Berkhamsted I believe this plan imposes a massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt and our status as an AONB. Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily.</p> <p>The plans propose an over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. The Council has an obligation to protect the AONB and its environs.</p>

The council does not appear to have used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need of around half of that currently proposed in the plan. Therefore a large area of green belt land would be destroyed un-necessarily.

There do not appear to be evidence based carbon reduction targets mentioned and how the plan proposes to meet these.

The plan does not appear to address the need for improvements in infrastructure which such a large scale plan would need e.g. traffic congestion and already stretched healthcare provision.

Have brownfield sites been considered as an alternative, the government allows commercial and office space to be converted to residential, as well as adding additional storeys on top, without the need for planning permission. With recent changes brought about by Covid and Brexit these options should be looked at.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3838

**Person ID**

1153890

**Full Name**

elisabeth Bendall

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

The Housing targets are WRONG.

**I refer to the Open Letter from Dacorum Liberal Democrats to Rt. Hon. Robert Jenrick *Minister for Housing, Communities & Local Government* dated 31st January 2021.**

I AGREE with the contents of this letter that state: *“it is perverse that the Ministry has chosen to apply the new algorithm to 2014 Office of National Statistics Data (ONS) data rather than the more recent 2018 ONS data. Not only is it illogical to use historic data, there is no consideration of the effects that Covid and Brexit have had on levels of housing need.”*

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3849
<b>Person ID</b>	1263982
<b>Full Name</b>	Lisa York
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Too many new homes
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3890
<b>Person ID</b>	1263998
<b>Full Name</b>	Mrs Lara Dixon
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	<p>we need to conserve natural   agricultural habitats and not build on greenfield sites, prioritising brown field-sites instead. Protecting these green spaces and the established Green Belt will benefit</p> <ol style="list-style-type: none"> <li>1. rapidly declining wildlife populations</li> <li>2. the climate through increased carbondioxide uptake by plants and trees</li> <li>3. human health and well being</li> </ol> <p>Over estimate of housing need: 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.</p> <p>Berkhamsted and Tring housing developments : The proposals for any changes to infrastructure do not compensate for the number of extra houses proposed . The road network is already at capacity, as are medical services and school places. Further development would change the essence and charm of these small market towns and destroy the unique community spirit that exists.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3907
<b>Person ID</b>	742793
<b>Full Name</b>	Mr Lawrence Sutton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>While I do agree with council's overall vision of: good homes and jobs, excellent education and health, sustainable transport, protecting the environment and resource.</p> <p>The problem is also that the draft plan is about building many homes on Green Belt land that the Council should be protecting. The fact is that the Council has not challenged what they believe to be the Government's target of 16,596 new homes in the borough over the next 18 years. This represents an increase of 114% over the 2013 core strategy, the current plan. The result of this is that 5,954 homes would be built on Green Belt on the outskirts of Berkhamsted and Tring. By deciding to build on Green Belt the Council is ignoring the national Planning Policy and statements by Ministers</p>

including the PM that Green Belt should NOT be developed except in 'exceptional circumstances'. The Council's justification for 'exceptional circumstance' is meeting a government target which was never a hard number in the first place.

In the councils 'Overarching Vision for Dacorum's Growth by 2038' it is stated that "All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place." Berkhamsted is a small market town built on steep sides of a valley. The Green Belt land that would accommodate new houses are the last open spaces that remain within the town and if they go it would drastically change the town forever. It would seem the plan was designed by somebody with NO detailed understanding of the place at all

It is also stated that: "Growth will have been accompanied by supporting services and infrastructure which were delivered at the right time and benefited new and existing communities, particularly transportation, education and open spaces, to have created healthy and sustainable developments". The majority of the proposed new houses in Berkhamsted would be built on the top of steep hills and also a good distance from town. This would inevitably lead to an increase in traffic in the town as the majority of people will not walk to go shopping. How can this be sustainable when we should all be reducing emissions not creating new ones? How can building on Green belt in Berkhamsted be supporting open spaces when it is the exact opposite? How can any of the resulting extra traffic, noise and pollution from the new cars on the roads in Berkhamsted be of any benefit to the existing community?

It also states that: "Dacorum will have in place a network of cycle lanes and secure bike parks, that have encouraged greater levels of cycling and walking, while also having promoted the use of public and greener transport." Berkhamsted may benefit from new cycle lanes but as the new houses are mostly on top of very steep hills I cannot see them getting that much use. The train station in Berkhamsted is some distance from all the new proposed housing and would only seem to encourage more people to drive to the station rather than to do any walking.

It also states that: "An active lifestyle will have been encouraged and supported through the provision of open space, sport and recreation facilities. Opportunities for all people to increase their levels of physical activity will have been supported with improved provision of active travel." How can building on open space be seen as encouraging its use for an 'active lifestyle'? Currently footpaths cross the Green belt land which will be built on and these are 'open space'. Walking or running through a large housing development will not be in any kind of 'open space'. In Berkhamsted the new houses will also be some distance from the town and at the top of hills. This will not 'encourage and support' any active lifestyle but will encourage the use of many more cars.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS3909

**Person ID**

1263988

**Full Name**

Andrew Grout

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	There appears to have been zero thought put into the plan. How can Tring have 2,731 extra houses ! There is already a large development on the edge of the Town. The current infrastructure struggles to cope with the size of the town now. This will destroy a lovely market town.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3913
<b>Person ID</b>	1263999
<b>Full Name</b>	Jeremy Wray
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3923
<b>Person ID</b>	1264025
<b>Full Name</b>	Caroline Sherwen
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>While I recognise the need for new homes, the scale of this developmnt and the fact it's on greenbelt land is unacceptable and unimaginative.</p> <p>The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3938
<b>Person ID</b>	1264030
<b>Full Name</b>	Sean Collier
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	I agree with the points deemed most important to residents (ie. affordable housing, economic growth and a clean/enjoyable environment). I also believe a green, clean borough is right for Dacorum.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS3999
<b>Person ID</b>	1264045
<b>Full Name</b>	Daniel Farr-Smith
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	It seems as though this plan is not building enough affordable housing and therefore does not meet the needs of the area.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4012
<b>Person ID</b>	1264047
<b>Full Name</b>	James Puddiphatt
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	<p>I don't approve of much of this local plan.</p> <p>Far too much emphasis on greenbelt land. Not enough brownfield land has been identified for development.</p> <p>The housing target is too high for the area and its associated population growth, amenities and roads and facilities.</p> <p>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.</p> <p>Roads and parking is already maxed out.</p> <p>Wildlife corridors and habitats have already suffered because of recent housing developments, will suffer yet again and species will die out.</p> <p>Personally, Granville road is already congested and safety of residents is a real concern. Especially younger children walking to school.</p> <p>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.</p> <p>Local heritage and AONB will be ruined and decimated if the East of Darrs lane development goes ahead.</p> <p>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.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4025
<b>Person ID</b>	1261922
<b>Full Name</b>	Tricia Kennedy
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Comment</b>	<i>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.</i>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4030
<b>Person ID</b>	1264064
<b>Full Name</b>	Melanie Ingram
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	<p>I strongly disagree with the scale of the target for housing in Dacorum raised within this Local Plan - a 25% growth (16,596 houses) in housing, when there is little 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>Already there are large volumes of housing available (a simple check on rightmove offers up 1,055 properties for sale of which a proportion are already sitting empty) and additionally I understand there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>The new local plan vision facilitates a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough as it represents a 55% growth (2,700 houses) in housing in Tring, which as a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead (which has a higher availability of brownfield sites) with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty, it also has significant impact on the community aspect of the town with little to no consideration given to infrastructure to cope with increased demand in the small high street. There is very little regard to preservation of the towns character as well and would ask that councillors reflect on whether they feel the loss of natural areas, biodiversity and historic town character is something that would be proud to say they approved to their own family and friends.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. The current schools in the area struggle to provide appropriate capacity and are over subscribed so to only justify additional educational facilities as a by-product of unjustified large scale growth to Tring will simply compound an existing problem where the need is not being met.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4034

**Person ID**

1264070

<b>Full Name</b>	Michelle Carnegie
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Whilst I agree that we need more housing, jobs, education, transport and to protect the environment lam very concerned that the intensive building on mostly greenbelt land is the way to do this. There is an increase of over 114% over the 2013 core strategy.I thought greenbelt land shouldnot be built upon except in exceptional circumstances, I donot understand why the sudden dramatic increase almost exclusively centred around Berkhamsted and Tring.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4043
<b>Person ID</b>	1261199
<b>Full Name</b>	Will Bentley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	I think on balance the Vision and objectives are appropriate but I can see no tangible evidence or objective assessment of how the plan delivers against these objectives and in many instances appears to wholly contradict the Vision set forth.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4048

<b>Person ID</b>	1250022
<b>Full Name</b>	Mr Michael Ridley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I have considerable concerns regarding NLP, summarised as follows:</p> <p><b>1 The plan fails to justify the huge loss of Green belt land</b>, in particular the outstanding vistas seen across the Gade Valley north of Hemel Hempstead.</p> <p>DBC appear to have cherry picked the guidelines of the NPPF, ignoring clauses that would allow a lower Housing Number. Christopher Pinchen MP (Housing Minister) in a letter to Cllr Andrew Williams has stated:</p> <ol style="list-style-type: none"> <li>1 <i>“Authorities should make a realistic assessment of the <b>number of homes their communities need</b> as the starting point in the process”</i> The latest ONS figures do not support the claim that 16596 homes are needed.</li> <li>2 <i>“10.3 Chapter 3 of the NPPF ... states that all policies: “should be underpinned <b>by relevant and up-to-date evidence</b>”</i>The up-to-date evidence from the ONS is that Dacorum’s community needs ~354 homes per annum, which even including the x1.4 cap requires only 496 homes pa. This is well within DBC’s own stated figures of being available from Non-Green Belt land.</li> <li>3 <i>“Once this has been established, planning to meet that need will require consideration of land availability and <b>relevant constraints such as Green Belt</b>”</i>. There is no conceivable justification that the land either side of the Gade Valley should not be constrained as an outstanding area of scenery within the green belt.</li> </ol> <p>It is concerning that the much lauded Garden Community Phase 2 earmarks a further 4000 homes on Green Belt land. This belittles DBC’s claim that only 1/3 of the proposed sites are on GB land, and would result in half the homes being built on Green Belt.</p> <p><b>2 DBC appears to be prepared allow even more development than the NLP proposes.</b></p> <p>Some development sites have already been granted planning permission for more homes than proposed in the plan, and others sites are being actively pursued by developers even though the sites are not in the NLP. The Public deserve to know where homes will not get planning permission, in addition to the site allocations in the NLP. I refer specifically to plans by Thakenham Homes, SE of Berkhamsted, and land north of Gadebridge, where an archaeological impact assessment has recently been conducted.</p> <p><b>3 The NLP does not have the support of the Elected Representatives.</b></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.

**4 Protection and enhancement of biodiversity and action to combat climate change are not rigorous or sufficiently date stamped to guarantee compliance by developers.**

While considerable emphasis is placed on sustainability, the wording is aspirational rather than mandatory. Biodiversity enhancement using offsets are extremely difficult to achieve and existing technical innovations to reduce carbon emissions could be implemented by dates earlier than specified.

**5 The NLP fails to factor in the “New Normal”**

With the post-Covid and post-Brexit “New Normal”, and the current demise of the retail shopping trade it is likely that the set of needs for which the NLP has been planned will not materialise. There does not appear to be any process to prevent the developers from ‘Cherry Picking’ the most controversial and damaging Greenfield sites, even if the prevailing economic situation then results in not all the sites being taken up.

**6 The NLP lacks any vision for the social and cultural development of the Borough.** The former Market Square and Bus station in Marlowes was designated as a ‘leisure quarter’, but the site appears to now be intended for housing and commercial development. This fails to deliver to the residents of Dacorum the leisure quarter that they were promised, or the Pavilion replacement that they were promised before that. This land, being publicly owned, should be used for **the direct benefit of the public.**

**7 The NLP is incomplete.**

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.

Specifically:

*Climate Change and Sustainability SPD*

*Detailed Design Guide SPD*

*Climate Change Strategy and Action Plan*

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4053

**Person ID**

1264144

**Full Name**

Ruth Briggs

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I am writing to express my strong opposition to the proposed local development plan for which you are now consulting local opinion, particularly with regard to Berkhamsted</p> <p>There are many submissions that have already stated that the formula used to calculate the total development requirement is flawed and therefore the whole plan needs to be revisited to make the outcome credible and proportionate. Berkhamsted lies in an ANOB and excessive development will inevitably have a detrimental impact on these special green belt surroundings and SSSIs we are fortunate to have in our area. Preservation of this environment is more important than ever with the demands placed on it. The Chiltern Society have expressed their opposition and I support their objections completely.</p> <p>HS2 is causing the most appalling environmental impact on the Chilterns, allegedly to allow faster transport between north and south and expand the ability to commute to much further afield. Adding an excessive level of commuter style housing to the Chilterns is contradictory and exacerbates the ongoing environmental damage.</p> <p>The consultation process has been based almost entirely online and therefore excludes sections of the community that do not use social media or who aren't members of the appropriate social media groups. The online exhibition doesn't have the information regarding housing architecture, expected cost or occupants. Will there be provision for first time buyers, social housing, sensitive design rather than developer led, bland, red brick, shoddily built commuter homes. Will it offer balanced changes to the local population or will there be another significant retirement development?</p> <p>Developers should be required to complete the brownfield sites already earmarked. The site near Billet Lane has been left with no material progress for so long and failure to complete development of the social resource of a supermarket and entry level housing sets a poor precedent for any similar proposals included in the development plan.</p> <p>There is also the local proposal to move the football club to a site near Bourne End and I disagree with this proposal completely. It is important for the club to stay in the heart of the town. Moving the facility towards Bourne End only furthers the creep of Bourne End and Northchurch losing their separate identities and it will be more likely the football club members to drive to the facility rather walk or cycle. The club itself is vehemently opposed to this move and I agree with their stance completely.</p> <p>It is important that you do not just ignore the voice of the local community having asked for their views in this consultation. Expert agencies such as CPRE, the Chiltern Society, the local Labour Party and Liberal Democrat parties do not support the plan. The local community do not support the plan. The figures used to devise the plan are flawed. Time to go back</p>

to the drawing board and incorporate the many views and pieces of information submitted to enhance, not smother this lovely market town.

The only issue I will base my voting decision for in the upcoming local elections is a party that will guarantee a revision of these plans. I feel so strongly about this, I have never complained to the council about anything before but I will not stand by and let this development plan continue without voicing my objections repeatedly until someone listens and respects local opinion.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4055

**Person ID**

1264169

**Full Name**

Alex Crossette

**Organisation**

Old Residnet

**Agent ID**

1264131

**Agent Full Name**

Alex  
Crossette

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Housing strategy is going against the fundamentals of the why the green belt was instigated. This spatial plan is the definition of urban sprawl and in some areas promoting the space to be used for linear development. Redbourn would effectively merge with Woodhall Farm and, Grovehill and Piccotts End.

Spatial plan has no heirachy of brown field sites or areas which can easily be encompassed for small in fill locations. Heavily reliant on combining existing settlements together via the green belt land already in place. Large areas of argicultural land will be lost forever with this change, land that is useful for growing crops to feed an ever growing population, as well as livelihoods and generations of land workers.

Housing requirement is large and the population increase could be upwards of a third. Does not seem to have enough commerical land set aside for this increase of work force. Plan does not allocate and detail enough land/space for amneties for the existing and future residents.

Spatial plan is reliant on London being prosperous and the being apart of the commuter belt. No provision on the spatial plans for enhancing of road networks, rail links or provision for low carbon transport.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4062
<b>Person ID</b>	1263883
<b>Full Name</b>	New Gospel Hall Trust
<b>Organisation</b>	New Gospel Hall Trust
<b>Agent ID</b>	1263872
<b>Agent Full Name</b>	John john.shephard@jjdesign.org.uk
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>New Gospel Hall Trust (registered charity no 1159952) welcome and support the Overarching Vision, in particular the commitment to accompany proposed growth with supporting services and infrastructure and the recognition that this will benefit new and existing communities and create healthy and sustainable developments.</p> <p>The Trust also support the Health and Wellbeing section of the Vision.</p> <p>New Gospel Hall Trust are responsible for the provision and maintenance of Gospel Halls (places of worship) in Dacorum and adjoining local authority areas on behalf of the Plymouth Brethren Christian Church. The Trust have a current need to identify an additional site for a new place of worship and anticipate the need for a further site in the borough within the LP period to 2038. The Gospel Halls operated by the Trust are all dedicated to the worship of God, for prayers and for gospel preaching. The Trust do not sub-let their halls for other secular activities, including any social or recreational uses. The Trust is closely associated with and may wish to include storage facilities for the Rapid Relief Team which is the church charity dedicated to catering support of the emergency services and wider community needs during public emergencies such as flood events, together with support for homeless persons.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4074
<b>Person ID</b>	1261508
<b>Full Name</b>	Andy Mitchell
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I feel Hemel Hempstead is now full</p> <p>It was disigned for 60,000 people and already grown to 100,000 without any upgrades to the existing roads, paths or cycle paths</p> <p>Building houses on the Maylands Business Park, sends out the wrong message - you should be encouraging Business to reloacte into these pockets not building flats - where are these people supposed to work?</p> <p>Why has the Hospital site been designated as new housing - we should be pressing for the retention of the hospital and pushing for more services there</p> <p>The market Square was ear marked for a Arts facility - why has it now gone for housing</p> <p>Where are the people from Hemel supposed to spend their leisure time??? - driving to Watford or St Albans - very green!</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4075
<b>Person ID</b>	1264210
<b>Full Name</b>	Fiona Fulford
<b>Organisation</b>	myself
<b>Agent ID</b>	1264200
<b>Agent Full Name</b>	Fiona Fulford
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The vision is contradictory. The amount of housing and development proposed is incompatible with aims for sustainavility of biodiveristy and protection of the green belt and adjoining AONB/ Special interest Beeches areas.

We need additional housing especially affordable but the housing targets are based on incorrect projections from 2014 rather than 2018. Using the latter would halve the number of houses required. In addition more creative use of brown field sites (and a full review of brown field opportunities is required). The pandemic has shown more people working from home and this may actually mean that more people want to live further beyond the London commuter belt in which Dacorum currently sits.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4081

**Person ID**

1264201

**Full Name**

Philip Hughes

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

3.6 The vision is contradictory. It appears that building a huge number of houses relative to the existing population overrides all other factors mentioned. For example the vision to cherish the natural beauty of the environment is clearly not true when the proposals are to build houses on countryside.

The goal to reduce our contribution to climate change is also not compatible with building huge numbers of houses. Have the carbon emissions from construction, loss of countryside and the subsequent emissions from the new houses been taken into account? The best thing for climate change is to improve the houses we have and not build any more.

The vision for all areas includes the words 'will have grown significantly'. Why is this the vision? Do residents of these areas want their towns and villages to grow significantly? I certainly don't.

3.7 There are 7 Strategic Objectives. There might as well only be the first one, which is to deliver lots of additional homes, because this trumps all the other objectives.

Ask residents of Dacorum do we want to build thousands of new homes. I suspect the answer is 'no'.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS4097
<b>Person ID</b>	1264224
<b>Full Name</b>	Victoria Lindsey
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>An enormous amount of work and dedication has gone into our Borough plans over many years. The latest one, the draft Local Plan, 2020-38, gives Dacorum residents an understanding of the affordable home building challenge.</p> <p>Dacorum Borough Council's (DBC) elected leaders state that one of the aims of the Plan: "Is protecting the health and well being of its residents."</p> <p>Unforeseen events have rapidly changed our every day life emphasizing the importance of health and sustainability. This consultation has given some residents an opportunity to flag up new issues that have emerged since the pandemic and the increasing climate crisis.</p> <p>The UN's Security Conference heard from one of the world's leading conservationists in February. Sir David Attenborough said: "No matter what we do now some of these (Climate Change) threats assuredly will become reality in a few short years."</p> <p>This draft Plan looks further than the next few years to 2038 and beyond with Phase 2.</p> <p>Whilst water security and supply is not a statutory requirement of DBC can we find out what new plans there are to increase water capture before we embark on increasing the number of residents here? The draft Plan's new housing figures would mean Dacorum's population would grow by over 30 per cent.</p> <p>With the amount of water abstraction, from rivers and chalk streams, already a major concern could water capture initiatives be solutions to help supplement current supplies in increasingly drier Summers? New builds are often constructed with water butts to capture rain. Could utility water bills include a website address to give advice on water butts? As well as storing rainwater research scientits have found a way of utilising them to allieviate flooding. When there is a local flood alert a timer releases the water in the drains before the storm starts.</p> <p>The Plan mentions providing a new park in Phase 1. Would this be an opportunity to link this large out door space to a new reservoir as well as new allotments schemes? And some development land could be used for temporary allotments until house building started.</p>

Could we have clarification of the Plan's commitment to new allotments? The Field's in Trust (FiT), Table 30, recommends benchmark provision and accessibility standards for Open Spaces. The recommendation for allotments is 0.25 hectares per 1000 of the population. How many allotments are there in Dacorum? When the New Town was built many of the allotments were removed. While new Dacorum allotments are likely to be smaller than the current plots they will offer outdoor exercise for a growing number of people who have found peace of mind growing plants.

Lastly could more Sustainable Drainage Systems (SuDS) be built to protect against flooding and safely supply stored rainwater to near by growing areas such as allotments?

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS4131

**Person ID** 1264265

**Full Name** Mr C

**Organisation** Grove Fields Residents Association

**Agent ID** 1264261

**Agent Full Name** Christopher  
Whitehouse

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>Comment</b>	<p>I attach a submission raised on behalf of 645 members of the Grove Fields Residents Association, which responds to the questions raised in consultation, in order.</p> <p>I have also submitted this on behalf of the association, via the consultation email address.</p>
<b>Included files</b>	<a href="#">0485-02 Consultation Comments on Emerging Strategy FINAL with Appendix.pdf</a>
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4162
<b>Person ID</b>	1145844
<b>Full Name</b>	Dr and Mrs Melvyn Else
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The plan requires the release of large tracts of Green Belt land but fails to fully make use of suitable brownfield sites and underutilised land in accordance with para 136 and 137 of the NPPF. Sites submitted to the council for inclusion on the brownfield register in 2017 have been ignored while Green Belt land has been transferred for housing development. The council has failed to prove its case that the "exceptional circumstances exist" for the transfer of such large areas of Green Belt land when it does not fully utilise available existing urban sites.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4166
<b>Person ID</b>	1264269
<b>Full Name</b>	Paul de Hoest
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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>There is no discernible overarching vision for our towns and villages in this document. Despite grandiose words such as "maintaining and enhancing the charm of our market towns" or "enhancing the natural landscape" or "reducing our carbon footprint" the reality is that this plan slavishly follows an unsubstantiated, unreasonable and unnecessary target for new house building and rams this building wherever they can be squeezed. Simply bolting 17,000 new homes onto the outer fringes of the three main towns in the borough with precious little thought to additional infrastructure, the narrowness of existing town centre access, the local topography and so forth does not amount to a Vision or a Strategy. It is simply coping in what you perceive to be the least harmful manner. But be in no doubt incorporating unnecessary new building on this scale despite your best efforts will be fundamentally damaging to the well being of our people, our environment and our heritage. In addition the imposed target is based upon out of date projections of the ONS - if 2018 data rather than 2014 data are used then the required target is approximately 1/3 of that in this plan. If that degree of change can occur over four years it demonstrates the flimsiness of the underlying premise.</p> <p>Even Cllr Williams wrote to the Secretary of State to protest at the arbitrary unreasonableness of the growth target imposed.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4169
<b>Person ID</b>	1264282
<b>Full Name</b>	Shirley White
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I think that too many new houses are being built. Too many expensive houses are being built in Berkhamsted and the towns infrastructure can not cope with the existing influx of new residents. It's very difficult to get doctors appointments or to park outside your home if you live near the centre of town.</p> <p>I also feel that this document is much too complicated and that the average person does not have enough spare time to read every section and comment on your loads of waffle. We are really interested in protecting our green belt and our environment. I understand some new homes need to be built but I think you plan does not follow the existing government policy.</p> <p>Also the Borough Vision – The Council's Vision is one i would sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4190
<b>Person ID</b>	1264301
<b>Full Name</b>	James Stringer
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>There is no evidence to support the target of 25% growth (16,596 houses) in Dacorum; the ONS has forecast just 9% population growth for the same period. I believe there is enough available non-green belt land to accommodate this growth, and green-belt/AONB land should certainly not be utilised unless there is no other option.</p> <p>I strongly disagree with the plan's disproportionate growth strategy for Tring - would see the town becoming 55% bigger. Compare this to Hemel Hempstead with plans for 23% growth, and the ability to use brownfield land, with local services able to facilitate such levels. Meanwhile, the contribution of Bovington, Kings Langley and Markyate will just be 13% growth. It's clear that the weight of the growth plans should be far more equitable between different settlements in Dacorum.</p> <p>The rise in housing will not be accompanied by a commensurate rise in jobs, meaning many new residents are likely to be commuters. It's clear that Tring's layout already pushes much of the town's traffic onto a few key arteries. With a population growth of 55%, these would only become more congested - and the plan fails to offer a vision of how to tackle that. While bicycles and pedestrians are to be encouraged, the station is too far from the current town to make this reasonably possible for many commuters.</p> <p>The 55% growth target for Tring would require a disproportionate green belt allocation to deliver the requisite houses. I strongly object to, and dispute, the proposition that Tring is required to "play a much greater role in delivering housing growth" within the borough. As a relatively new citizen of Dacorum myself, I believe Tring should be allowed to grow and develop for other new residents, but not at the expense of the Green Belt and AONB status that attracts people to the area in the first place. Housing can, and must, be delivered within the existing settlement boundaries. I do not believe the possibilities of developing in such a manner have been sufficiently examined.</p> <p>The plan claims to have "delivered a comprehensively planned new neighbourhood to the east of [Tring] in a way that takes account of sensitive views, landscape or protected environmental sites." How can this be if the plan intrudes into Green Belt land - and fails to justify the exceptional circumstances that justify such a thing?</p> <p>The vision of delivering open space and sports and leisure facilities is commendable, and should be encouraged - but it is self defeating to do that as part of a plan that detracts from the AONB which itself encourages residents to exercise and play sport.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4220
<b>Person ID</b>	1263248

<b>Full Name</b>	Johnjo McDermott
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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 (<a href="http://www.lichfield.uk">www.lichfield.uk</a>).</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>

## 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

## Consultation Point

Borough Vision to 2038

## Comment ID

EGS4248

## Person ID

1263561

## Full Name

Alexander Bhinder

## Organisation

## Agent ID

## Agent Full Name

## Agent Organisation

## Yes / No

Yes

\* Yes

\* No

## Comment

- A Clean, safe and enjoyable environment
- Building strong and vibrant communities
- Ensuring economic growth and prosperity
- Providing good quality affordable homes, in particular for those most in need
- Ensuring efficient, effective and modern service delivery

Where are the criteria for the above defined? Who has defined the criteria for the above?

**Overarching Vision for Dacorum's Growth by 2038, Environmental Sustainability, Economic Growth, Health and Wellbeing** all sounds fantastic but how is all that going to be achieved with a some one thousand homes a year being built in the borough. I'm sorry but I can't see it.

**The Countryside and other small villages** will:

- be protected from development; and
- have diversified further to support changing rural and agricultural practices.

But that doesn't include Green Belt?????

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4249

**Person ID**

1261915

**Full Name**

Eleanor Lovett

**Organisation**

Landhold Capital

**Agent ID**

1261754

**Agent Full Name**

Eleanor  
Lovett

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Landhold Capital considers that whilst overall the Vision and Strategic Objectives are generally adequate, the Council has failed to fully recognise the opportunity posed by this emerging Local Plan. This includes fully utilising the potential to deliver growth in the District, to meet current and projected housing needs and secure the delivery of infrastructure to support development.

With regards to the vision for Dacorum's Places, it is considered that the Council has not recognised the role that the three 'large villages' of Bovingdon, Kings Langley and Markyate could play in helping to meet the Borough's housing needs. It is noted that unlike Tring or Berkhamsted, the Council only recognises the delivery of affordable homes in its Vision for the large villages, rather than seeking a mix of market and affordable housing. However, the Council expects these settlements to strengthen their role in providing services and facilities to serve residents and adjacent rural communities, alongside securing additional and improved local community facilities. It is considered that in order to

achieve this, it will be necessary for significant market-led housing developments to be secured at these settlements in order to strengthen their role and secure those additional or improved local community facilities and other infrastructure as appropriate.

It is a concern to Landhold Capital that the Council in its objectives, is only seeking to 'deliver the identified housing requirement between 2020 and 2038', which is not considered to accord with the provisions of the National Planning Policy Framework which at Paragraph 11 requires strategic policies to as a minimum, provide for objectively assessed needs for housing and other uses; whilst Paragraph 35 establishes that in order to be 'sound' the plan's strategy must be positively prepared, and as a minimum seek to meet the area's objectively assessed needs. It is considered that the Council should modify the objectives accordingly to reference the need to at least deliver the identified housing requirement as a minimum.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4256

**Person ID**

1264321

**Full Name**

David Fox

**Organisation**

personal

**Agent ID**

1264318

**Agent Full Name**

David  
Fox

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The vision is contradictory. The amount of housing and development proposed is incompatible with aims within the vision for sustainability of biodiversity and protection of the green belt and adjoining AONB/ Special interest Beeches areas.

We need additional housing, especially affordable ones, but the housing targets are based on incorrect projections from 2014 rather than 2018. Using the latter would halve the number of houses required. In addition, more creative use of brown field sites (and a full review of brown field opportunities is required). The pandemic has shown more people working from home and this may actually mean that more people want to live even further beyond the London commuter belt in which Dacorum currently sits. Therefore the housing numbers need to be completely revisited

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS4298
<b>Person ID</b>	1264325
<b>Full Name</b>	Olivia Halper
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>Hemel Hempstead vision needs to mention <b>key outputs of the Spatial Vision</b>:</p> <ul style="list-style-type: none"> <li>· Comprehensive green network of walking and cycling routes connecting to places within Hemel, the countryside and surrounding areas</li> <li>· Shift to sustainable modes of travel</li> <li>· Network of MMTIs and sustainable transport corridor A414</li> <li>· New, integrated and inclusive communities in walkable neighbourhoods</li> <li>· Self-sustaining economy: significant increase in local jobs / employment containment</li> <li>· Not 'commercial hub' but '(environmental) innovation hub'</li> <li>· Celebrate its culture and heritage/communities that are engaged in culture and heritage</li> </ul> <p>The vision should also specify - in the first bullet point about HGC new homes - housing and employment growth to the north and east of HH.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4360
<b>Person ID</b>	1264139
<b>Full Name</b>	Lynda Clarke
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>The Objectives are laudable, however the amount of development seems to be based on unsound projections and undermine the stated objectives. For example:</p> <p><b>1. Developing Dacorums future with Homes for Everyone.</b> The quantity of housing is based on the governments algorithm to address national need NOT the need already identified for Dacorum. Berkhamsted has already increased the amount of housing in recent years at a much higher rate than Hemel Hempstead and is pretty much at capacity and should not have grow by a further 25%. The cost of land,and houses, particularly in the south Berkhamsted area, is beyond that of an ordinary young family on average income even if adjusted for 'affordability'. Development here would therefore not be of the right type, the right quantity or the right place.</p> <p><b>Vibrant Economy</b> There is not sufficient local employment for a much increased population. Allocating land that is currently used for business eg the Jewsons area and the British Film Archive area will further exacerbate this and does NOT contribute to this objective.</p> <p><b>Mitigating and Adapting to Climate Change:</b> The proposed development areas, particularly in the south Berkhamsted area are at the top of the hill and are not large enough to be supported by very local facilities. Therefore new residents are unlikely to walk or cycle to access shopping and services and will drive down to the already congested town centre. Pollution is already high in the Lower Kings Road area and this will make it worse.</p> <p><b>Conserving and Protecting the Natural Environment:</b></p> <p>Building on the Green Belt areas, without better justification than that provided by the Government targets will permanently change and damage the 'distinctive landscape quality' of the attractive market towns of Berkhamsted and Tring and will reduce and damage the networks of green infrastructure particularly of Berkhamsted and its surrounding areas of Outstanding Natural Beauty. Increased car journeys will further reduce air quality particularly in the town centres (see comments above)</p> <p><b>Ensuring an Attractive and Valued Built and Historic Environment</b> the Covid pandemic will result in significant changes to shopping and business practices that are likely to lead to significant opportunities to build on brown field sites. The contribution of 'windfall' sites is therefore underestimated in this plan.</p> <p><b>Promoting Sustainable Transport/Connectivity:</b> The proposals, particularly for Berkhamsted will not encourage sustainable travel due to the geographical hilly nature of he area and very limited highway improvements to facilitate walking and cycling. The existing rail routes are at capacity and would not cope with the resulting increases in commuter traffic and the bus services currently do not provide good services other than daytime weekdays and this is mainly only</p>

running along the valley routes, making bus travel unattractive for those living out of the valley eg in the proposed areas of development.

**Supporting Health Wellbeing Cohesion:** I repeat comments above relating to walking and cycling. Reduction of green areas and building on existing sports fields eg Haslam fields is in direct contradiction to this objective. The type of housing that is likely to be built in an area of Berkhamsted that commands high house prices is highly unlikely to contribute to reducing inequalities or to promote social inclusion. The recent development of Bearoc Park demonstrates this.

**Enabling the Delivery of Infrastructure** I see very little to support this, particularly in Berkhamsted and Northchurch. Bell Lane and Darrs Lane are narrow country lanes and will not be suitable for increased traffic. The Kings Road/Kingshill Way/Shootersway junction already struggles to cope with increased traffic levels and in spite of extensive highway engineering still is a difficult junction to negotiate.

**As we had not been circulated with the Proposal brochure and I have only been made aware of this consultation in the past couple of days I have not had time to provide a proper response or accumulate supporting evidence. Because of this I would like to add my support and refer you to evidence collected and presented by Berkhamsted Citizens Association, Berkhamsted Town Council, Berkhamsted Residents Action Group and the Campaign for the Protection of Rural England.**

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4361
<b>Person ID</b>	1262873
<b>Full Name</b>	Donna Atkinson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	This proposal seems to disregard the need to minimise the impact on the 60% of Dacorum that is Greenbelt and the 33% which is AONB. There will be a negative impact on the environment, infrastructure, climate change and Bio Diversity, causing massive harm to the Green Belt and AONB.

The sheer scale of the proposed housing development is too much for the area to cope with, housing need should be based on the most relevant and recent data, which is currently the 2018 based Office for National Statistics (ONS) projections.

The Council has based its calculations on the outdated 2014 data, resulting in a significant overestimation and bringing the plan into question.

The proposals in the plan for the infrastructure and employment growth are not sufficient for the dwellings proposed. Commuter towns require transport to make journeys out of the town to travel for work, the present road and rail networks will not sustain such an increase in population.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS4424

**Person ID** 1264374

**Full Name** Belinda Hunt

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

**Comment** However if you are planning on protecting the countryside and villages and on supporting conservation and the environment, there should be no major development in the w8ngrave longmarston cheddington area beyond the immediate airfield.

There has already been too much expansion of the villages and the infrastructure cannot support more.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS4433

**Person ID** 1264363

<b>Full Name</b>	Roselyn King
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Many of your aims are admirable, but the proposed development of housing in North and East Hemel will involve destroying scenic areas which are much appreciated by many locals and greatly benefit their physical and mental health. A report by CPRE says that there is enough space on brownfield land across England for the Government to meet its targets for new housing without building on the countryside. I would love to see Dacorum Borough Council petition the Government to protect the Green Belt and significantly reduce its demands for new housing in Dacorum in view of the high amount of particularly scenic areas in the borough.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4439
<b>Person ID</b>	1264316
<b>Full Name</b>	Melanie Turner
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in Berkhamsted. This will result in a massive increase in traffic/congestion, with poorer air quality.  DBC declared a climate emergency more than a year ago. Despite this, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency.

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  
Nearly all development proposed will be on Greenbelt. – this is against Government policy.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4476

**Person ID**

1264395

**Full Name**

R Jane Dickson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

You state that “the main thrust of the Local Plan is Central Government’s requirement to provide nearly 17,000 new houses in Dacorum by 2038.” However, the ONS 2018 based Household Projections for England (Table 428) indicates an increase of only 8,800 households in Dacorum between 2018 and 2038. Planning for 17,000 new houses therefore seems excessive. 60% of the proposed new housing, covering some 850 hectares would be on Green Belt land, some of which is also adjacent to or surrounded by the Chilterns AONB. Your summary document notes that “we are permitted to take land out of the Green Belt through our Local Plan in ‘exceptional circumstances’. We have established that these circumstances exist in Dacorum, as we cannot meet our growth needs on just previously developed land.” However, if Central Government have exaggerated the housing need so considerably, then surely much less development will be required?

Source: Household projections for England - Office for National Statistics

The Covid-19 Pandemic and its impact on commuting and shopping patterns may well result in previous retail and office sites within the urban areas becoming available for housing. The re-development of such brownfield sites should be prioritised over Green Belt and other rural areas.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4478

<b>Person ID</b>	1264398
<b>Full Name</b>	Caroline Merritt
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	You are destroying characteristics of villages. You are too short sighted. Adding all those houses to Markyate is ridiculous. The roads, gp, school will just not cope
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4516
<b>Person ID</b>	1261836
<b>Full Name</b>	Richard Sutton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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.</p>

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.

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.

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**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4555

**Person ID**

1264421

**Full Name**

Karen Mahony

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Crowded roads, useless train service, ugly buildings. Crazy to think the borough can accommodate all of these dwellings. Apsley has 2 trains per hour into London with diabolical conditions. London road gridlocked all day. No A&E... I could go on!

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4556

**Person ID**

1144689

**Full Name**

Dr Andrew Higginson

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>This level of development is unsustainable. We have already had an unacceptable level of development between the Cemetery and the Industrial Estate. The water supply which mainly comes from aquifers is already almost exhausted. The cycle paths and footpaths are poorly maintained, as are the roads and are inadequate for the the current population. The record of Dacorum caring for Tring infrastructure is already poor so how can we trust it to implement its promises of investment?</p> <p>Grove Road, Station Road, and in particular Cow Lane simply cannot safely take the level of traffic this plan will generate, neither can they be modified to do so.</p> <p>What seems to be little understood is that Tring is in fact a flood plane. Just concreting over the land to build the A41 caused a huge flood down Cow Lane and Station Road. If the land between Dunsley Farm and Cow lane is significantly developed the water run off is likely to again cause flooding as this land soaks up the water run off from the hills behind. The other piece of land under threat behind Grove Road is already very waterlogged in wet weather and I would guess any concreting over of the land between Cow Lane and Dunsley Farm is likely to cause the land behind Grove Road to flood. Has Dacorum actually done a proper assessment on the drainage of these two pieces of land? This land is also enourmously important to the wildlife of Tring partricularly our wild bird life.</p> <p>When we first moved to Station Road some 30years ago, the land behind us was designated AONB all the way to our rear boundary(now Damask Close). Without any proper consultation that I am aware of Dacorum quietly removed this designation. It is owned by Dacorum! For the moment I will say no more</p> <p>In reallity there are actually very few public green spaces that can be enjoyed by the public in Tring compared to say Aston Clinton Park. The land between Cow Lane and Dunsley Farm, <b>particularly as it is owned by Dacorum</b>, would be ideal to create such an amenity but once developed would lost. If one thing has been learned from the recent pandemic it is the value of Parks and open space within or near to residential areas. It is vital that this piece of land is not only protected from housing development but that it is planted and developed as an open recreational space that preserves its functions as flood protection, as a reservoir of wildlife and as an essential part of the character of Tring. I don't see this as incompatible with providing sporting and schooling facilities if properly planned.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4567

<b>Person ID</b>	1145918
<b>Full Name</b>	Mr Richard Tregoning
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	There must be some growth but a strategy which foresees 30% growth in a period of 4.7% growth whilst National Government is trying to limit South East growth has no basis therefore the entire strategy is at fault and needs in light of the new circumstances to be entirely redrafted
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4590
<b>Person ID</b>	1264453
<b>Full Name</b>	Fiona Hinton
<b>Organisation</b>	Myself
<b>Agent ID</b>	1264426
<b>Agent Full Name</b>	Fiona Hinton
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The proposed plans would completely go against the Council's vision of a clean, green, healthier Dacorum by building over the Green Belt. These areas should not be built on without exceptional reason, and this has not been given.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS4599
<b>Person ID</b>	1263004
<b>Full Name</b>	Jill Townsend
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<ul style="list-style-type: none"> <li>• The numbers are wrong. DBC overstates the housing need. Brexit, the pandemic and the net export of well over a million people from the UK add to an already tenuous case for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), a study by G.L. Hearn and covers neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."</li> <li>• There is therefore no extraordinary reason or need for Green Belt to be encroached and these plans should be stopped immediately</li> <li>• The plan is over 18 years, this seems excessive when the future is uncertain. DBC would do better to develop the short term plan it is required to do focussing on builds outside of Green Belt and with an aim to rejuvenate town centres.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4608
<b>Person ID</b>	1264462
<b>Full Name</b>	Penny Clifton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

* No	
<b>Comment</b>	<p>Reading the draft plan feels as though I am looking at two different documents; one talks about environmental sustainability, the climate emergency, the natural resources and the special character of Dacorum, its towns and villages. The other seems to totally ignore all of these considerations and concentrate solely on housing and development, at the expense of any environmental or other considerations. There seems to be a lack of joined up thinking.</p> <p>The strategy's fine words about air quality, a low carbon future, health and wellbeing are totally ignored in favour of housing development. Development will inevitably mean additional car use, on roads of which are already overcrowded and where the hilly nature of the area mitigates against walking, cycling etc into town centres. The plan as proposed will destroy Green Belt land, destroy wildlife habitats and 'corridors', reduce air quality and take away some of the most beautiful parts of the borough currently used for walking and public enjoyment.</p> <p>The scale of development is breathtaking and would transform our borough for the worse; the market towns of Tring and Berkhamsted would be unrecognisable with an urban sprawl of new estates. The plans particularly affect these two towns with proposals that are completely out of scale.</p> <p>I would question the need for the amount of housing proposed. The figures imposed on Dacorum are based on false assumptions about the needs of the population. They are assumed to be targets which must be met, but my understanding is that the government has not said that these figures are 'targets'. I feel they should be challenged.</p> <p>This draft plan ignores the value and importance of maintaining the Green Belt, which I understand can only be used in 'exceptional circumstances'. No case has been made that our circumstances are exceptional. Huge swathes of existing Green Belt land will be developed through adopting this plan; once it is lost, it is lost forever and future generations will wonder what was the point of a Green Belt at all.</p> <p>Lastly I question the amount of research that has been done in Berkhamsted and Tring. The cynic in me wonders if someone took the Ordnance Survey map of the area, and thought the best and most simple approach would be to 'fill in' the green parts of Berkhamsted within the area bordered the A41 and the railway with housing, without understanding anything about the town or its context.</p> <p>In conclusion, I feel the plan is neither justifiable nor sustainable. It does not create a sustainable and manageable growth strategy for the area, with environmental considerations interwoven throughout. This has not been done and is a dereliction of duty by Dacorum BC.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4609
<b>Person ID</b>	1143273
<b>Full Name</b>	Mr Mark Rogers
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	The vision is good but HH should be a greater centre for all business, employment and retailing activities. The other towns and villages need to be preserved as close to their current existence as possible. This is due to the special place in the Borough. Urban dwellers need to be able to rely on the green space for leisure activities whether they be active or simply shopping. Losing these would condemn these locations into simply an extension of urban sprawl.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4614
<b>Person ID</b>	1264475
<b>Full Name</b>	Simon Davies
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The past financial and economic model has been broken by Covid. The High Street has changed, and people's work patterns have changed. This plan addresses out-of-date needs, if it addresses them at all.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4619

<b>Person ID</b>	1263087
<b>Full Name</b>	Alan Kondys
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I would like to see evidence that supports the stated number of houses needed and that the formula used to arrive at this number is correct.</p> <p>For example, in Berkhamsted what is the current number of houses?</p> <p>What is the proposed addition in the Plan as a %?</p> <p>What is the evidence behind this increase % being needed?</p> <p>Understand the actual requirement may be almost half of that proposed. Needs to be based on up-to-date statistics.</p> <p>Need to publish details of any brown field sites not being utilised.</p> <p>Need to explore/publish details of housing numbers that could be realised from conversion of commercial space.</p> <p>Covid 19 is likely to mean commercial space will become available.</p> <p>This is not considered in the Plan.</p> <p>There is an opportunity, particularly in Hemel Hempstead, to use capacity available for homes in the town centre and make this part of a broad town regeneration project to bring life and soul to the centre (not build houses in fields on the outskirts so people have to travel in and out).</p> <p>Above could mean that the green belt land is not needed and should not be unnecessarily released.</p> <p>The plan seems to be more about releasing land that is easy to build on and more profitable for developers.</p> <p>Once green belt is gone its gone and you/we have a duty of care and obligation to get this right for future generations.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4621
<b>Person ID</b>	1264477

<b>Full Name</b>	Vivianne Child
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Obviously a lot of work has gone into the plan and I appreciate the format and flow of the report. However, for me, the detail of the plan doesn't hit the vision and objectives.</p> <p>So, I agree with the vision, but the plan doesn't hit the mark,</p> <p>With the development proposed for my particular area I would strongly urge the comments made by Tring in Transition to be acted upon and incorporated into the proposals.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4645
<b>Person ID</b>	1264487
<b>Full Name</b>	Mrs Sue Edmanson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>Q1 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**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS4680

**Person ID** 1264485

**Full Name** Charlotte Brown

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment** This plan seems to mostly be about how many houses are to be built and where they will be located not so much about building a better Dacorum with jobs, environment etc. The council decided to accept the central governments requirement to build houses over the next 18 years without any challenge. The numbers quoted are completely unrealistic. Increasing the town of Hemel exponentially with no regard for local need or taking into regard the overall needs or character of the town. Most of the planning for houses in Hemel is on greenfield growth areas (known commonly as Green Belt). The council have ignored national planning policy contained in the NPPF and statements by ministers inc,using the PM that green belt land should not be developed except in 'exceptional circumstances' have also been ignored when developing this plan. The council does not explain why they have chosen to make this plan and what they deem to be the 'exceptional circumstances' in this case. The councils plan is not justifiable or sustainable and I object to it.DBC should revert to the core strategy vision statement. Going ahead with the plan as is will ruin Hemel as a town sitting in green belt with easy access to countryside for all

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS4681

**Person ID** 1261255

**Full Name** Sarah Lightfoot

**Organisation**

<b>Agent ID</b>	1261248
<b>Agent Full Name</b>	Sarah LIGHTFOOT
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I do not agree with 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth of 24% in dwellings and an enormous increase of 31% in the urban footprint will totally swamp the town of Berkhamsted and the Parish of Northchurch. The vast majority of the land designated in the plans is located within sensitive ridge top locations in Green Belt, at a distance of 3-4km from the town at the top of a steep hill.</p> <p>An increase in high-carbon forms of travel is inevitable with c15400 projected car movements daily - since the suggestion that residents will cycle and walk up this hill (especially with shopping or children) is ludicrous. Berkhamsted doesn't have the road infrastructure to cope, nor is there the ability to provide it given the historic built nature of the town. The plan being promoted can only be detrimental to both the Environmental Sustainability and Health and Wellbeing visions.</p> <p>I was present when DBC vociferously supported their 2013 Core Strategy vision of <i>"maintaining the strong valley and linear character of the settlement"</i> and strongly asserted to the Planning Inspector that <i>"The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported"</i>.</p> <p>DBC has performed a volte-face and is now promoting the land for removal from Green Belt. Their suggestion that development can now be built <i>"in a way that takes account of sensitive views and landscape"</i> was previously dismissed by them as undeliverable. They have ignored national Planning Policy contained in the NPPF and statements by Ministers including the Prime Minister that Green Belt should not be developed except in 'exceptional circumstances'. I support the arguments submitted by BRAG objecting to Green Belt development and will not repeat them here. The numbers are NOT targets and the Green Belt should be protected - just as DBC pledged to do in 2013.</p> <p>The arguments DBC employed earlier to reject the plans from developers to develop this same land as neither justifiable or sustainable have now been disregarded. DBC has totally shifted from their position of recognising and protecting the unique and historic assets of the two market towns (Berkhamsted and Tring) and their environments, to a position that makes no attempt to protect valuable assets of the Borough including large swathes of Green Belt. Rather than repeating those arguments at length here, I refer you to the statements made by DBC themselves in rejecting these plans in the 2013 Core Strategy.</p> <p>I believe that the arguments made by DBC in favour of the 2013 vision remain sound and no justification or explanation has been given – or can be given - to overturn the strongly made arguments that DBC made to the Planning Inspector.</p> <p>The 2013 Core Strategy Settlement Hierarchy states "Hemel Hempstead will be the focus for housing development within the Borough", while recognising that the Market Towns are "Areas of Limited Opportunity" and "The general approach in these locations will be to support development that enables the population to remain stable, unless a small element</p>

of growth is required to support local community needs.” This Settlement Hierarchy was ratified by the Core Strategy Inspector who concluded that “the Council’s approach of focussing growth on Hemel Hempstead is justified.” The Inspector pointed to “the sustainability credentials” of Hemel and contrasted that to the Market Towns where “The level of services and facilities is lower than at Hemel”, while also confirming that “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”

The current Garden Communities project would provide the housing numbers needed and would align with the settlement heirarchy supported by DBC in 2013. All of the housing identified in this project should be included in the current plan not held in abeyance whilst the Green Belt is permanently destroyed.

The 2013 vison should be re-instated.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4745

**Person ID**

1264491

**Full Name**

Paul Wade

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The Vision does not take into account Planning Policy - specifically with regard to Green Belt and AONB restrictions.

It is not clear why the number of houses are is justifiable.

The current infrastructure is inadequate and the Vision does not provide solutions to this or future development

Societal changes that have been accelerated by the pandemic will release brownfield sites (from retail and office space) which has not been properly accounted for.

**Included files**

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4789
<b>Person ID</b>	1264517
<b>Full Name</b>	James Webster
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Growth should be limited to brownfield sites and should not encroach on the green belt.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4809
<b>Person ID</b>	1264525
<b>Full Name</b>	JENNY TYLER-KONDYS
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Question 1: Do you think the overarching vision, the vision for Dacorum's places and the strategic objectives are right for the Borough? - NO</p> <p>I would like to see evidence that supports the stated number of houses needed and that the formula used to arrive at this number is correct.</p>

For example, in Berkhamsted what is the current number of houses?  
 What is the proposed addition in the Plan as a %?  
 What is the evidence behind this increase % being needed?  
 Understand the actual requirement may be almost half of that proposed. Needs to be based on up-to-date statistics.  
 Need to publish details of any brown field sites not being utilised.  
 Need to explore/publish details of housing numbers that could be realised from conversion of commercial space.  
 Covid 19 is likely to mean commercial space will become available.  
 This is not considered in the Plan.

There is an opportunity, particularly in Hemel Hempstead, to use capacity available for homes in the town centre and make this part of a broad town regeneration project to bring life and soul to the centre (not build houses in fields on the outskirts so people have to travel in and out).  
 Above could mean that the green belt land is not needed and should not be unnecessarily released.  
 The plan seems to be more about releasing land that is easy to build on and more profitable for developers.  
 Once green belt is gone its gone and you/we have a duty of care and obligation to get this right for future generations.  
 Please save our green belt land and put back more wild areas.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4810
<b>Person ID</b>	1264521
<b>Full Name</b>	Max Hidalgo
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	

<b>Comment</b>	The vision undermines some underlying rules of the use of green belt land. If the plan is allowed to go ahead in its current form this allows a dangerous precedent for future green belt use. There are many areas that could be redeveloped and brown field sites that are better suited to the development of the houses proposed. Green belt can never be replaced one use and removes access to green space for the community while creating further congestion to an already over congested area.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4821
<b>Person ID</b>	1264524
<b>Full Name</b>	Karen Kang
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	I do not feel that the plan reflects some of the key strategic objectives particularly around environmental sustainability and the importance of the countryside, supporting transport infrastructure particularly around the train station and the right type of housing for the right areas.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4834
<b>Person ID</b>	1264531
<b>Full Name</b>	PAUL KENT
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the</p>

sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4867

**Person ID**

1264533

**Full Name**

MAURICE OKEEFFE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

## Comment

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4887

**Person ID**

1150594

**Full Name**

Catherine and Mark Richardson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

We strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan and we believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

We agree with the plan's approach to prioritise housing growth in Hemel Hempstead as this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth and minimising any potential impacts upon important Green Belt.

The new local plan vision provides for a hugely disproportionate growth strategy for housing within Tring (55% growth) and fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate.

We object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is

a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst needs and aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

We strongly object to the claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

We absolutely welcome the requirement to provide a mix of market and affordable housing together with new community, recreational facilities and economic growth within the area. We are certain such planning can and should be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that most residents of Tring strongly object to. Such wide scale growth to Tring has not been sufficiently justified.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4898

**Person ID**

1264536

**Full Name**

Mr George Harvey

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth, within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4904

<b>Person ID</b>	1264537
<b>Full Name</b>	KATHERINE COURTNEY
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate</p> <p>Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p>

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4917

**Person ID**

1264534

**Full Name**

miriam rose

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Hemel does not have the infrastrucutre for the additional housing, no hospital facilities, in sufficient police facilities and road transport cannot support the additional traffice for this number of additional houses</p> <p>I strongly object to the loss of green belt land - this would have an extremely detrimental impact on the well being of the town as this area is used by many residents for exercise and recreation.</p> <p>The loss of green belt land is in contradiction with the stated aimes of supporting the environment. There are many brown field sites within Hemel which could be developed without having to impacting the green belt.</p> <p>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'.</p> <p>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</p> <p>The town needs more employent opportunities for existing residents.</p> <p>The development of the area around Grove Hill and Woodhall Farm is an area already with high density housing.</p> <p>Delivering Infrastructure to support growth – the IDP fails to adequately address issues, including traffic, water and wastewater, and is incomplete which reflects the reality that infrastructure always lags the development it is meant to s</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4922
<b>Person ID</b>	1264540
<b>Full Name</b>	JOSEPH DAWSON
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS4926
<b>Person ID</b>	1260771
<b>Full Name</b>	JAMIE BELL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

\* Yes  
\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4943

**Person ID**

1264544

**Full Name**

Bethan Fox

**Organisation**

Personal comment

**Agent ID**

1264539

**Agent Full Name**

Bethan  
Fox

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The vision is contradictory. The amount of housing and development proposed is incompatible with aims within the vision for sustainability of biodiversity and protection of the green belt and adjoining AONB/ Special interest Beeches areas.

We need additional housing, especially affordable ones, but the housing targets are based on incorrect projections from 2014 rather than 2018. Using the latter would halve the number of houses required. In addition, more creative use of brown field sites (and a full review of brown field opportunities is required). The pandemic has shown more people working from home and this may actually mean that more people want to live even further beyond the London commuter belt in which Dacorum currently sits. Therefore, the housing numbers need to be completely revisited.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4945

<b>Person ID</b>	1264546
<b>Full Name</b>	Dr Calvin Veeroo
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built</p>

infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4965

**Person ID**

1263960

**Full Name**

Mr Tim Amsden

**Organisation**

Chairman  
Tring & District Local History & Museum Society

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

They are based on absurd projections of population growth out of all proportion to the needs of the individual towns and villages. They show little understanding of the Borough and constitute a tick-box exercise taking no account of the

traditions and character of this unique area. Development on the scale envisaged is inconsistent with any objective to conserve and enhance what we have, and will damage it.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS4968

**Person ID** 1264548

**Full Name** Mrs Sasha Godfrey

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

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The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS4987

**Person ID**

1264549

**Full Name**

Mrs Kate Carter

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5021

**Person ID**

1264258

**Full Name**

Fintan FitzPatrick

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Climate Change Emergency

The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimizing carbon emissions during any construction. The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.

Overarching Vision: Environmental Sustainability

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only use electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

### Overarching Vision: Economic Growth

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

### Berkhamsted & Tring Developments

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum. The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns. The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity. To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

### Included files

### Consultation Point

Borough Vision to 2038

### Comment ID

EGS5024

### Person ID

1264557

### Full Name

Natalie Crane

### Organisation

### Agent ID

### Agent Full Name

### Agent Organisation

### Yes / No

No

\* Yes

\* No

### Comment

Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596

new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5041

**Person ID**

1264550

**Full Name**

Kevin Fielding

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The Theme wordings sound good, but do not match the plan details.

As a Berkhamsted resident, I know that the resulting plan has issues in the following ways

Theme 1: Building Dacorum's future with homes for everyone

We in Dacorum cannot be expected to provide future homes for "everyone". What we want is the right homes for our own residents and their families. Building large scale mainly detached housing estates on the outskirts of Berkhamsted on currently heavily utilised Green Belt Land will simply lower the quality of life for current residents and lead to an influx of new families from London outflow. A better way of wording this theme would be:

"Theme 1: Building the homes required by Dacorum's future generations"

Theme 3: "A happier, healthier and safer Dacorum"

The theme sounds good but simply is not adhered to in the current plan. The large estates planned for the outskirts of Berkhamsted will effectively remove the opportunity to walk directly to green belt land around Berkhamsted for exercise for current Berkhamsted residents. At present,, hundreds, perhaps even thousands are taking this opportunity EVERY DAY. Removal of this freedom will not make us happier. It will not make us healthier. And the increased traffic on the current relatively quiet, residential and school roads such as Hilltop, Swing Gate Lane, Upper Hall Park, etc. will certainly not make us, or our children, safer.

Theme 4: Creating a clean, green and attractive Dacorum

Again, the theme is good, but the plan is in complete opposition to this aim. Removal of green belt land to produce housing estates cannot be considered clean. Providing new housing outside the current town bounds will result in more road traffic and road journeys into town increasing pollution and cannot be considered clean. Expanding Berkhamsted into adjacent valleys, and on to the top of the Chiltern Hills cannot be considered attractive. A clean, green and attractive Dacorum will be achieved by sympathetic brownfield development, not by building sprawling housing estates across the Chilterns

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS5045

**Person ID** 1264532

**Full Name** Robert Clarke

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS5092

<b>Person ID</b>	1264563
<b>Full Name</b>	Liam Beere
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The plan involves a huge expansion into green belt land
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5111
<b>Person ID</b>	1264502
<b>Full Name</b>	R Phipps
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>It is inadequate as to Locations infrastructure and is inadequate as to the major need for affordable and Council rented accomadation is concerned.</p> <p>It makes proposals for use of Green belt that should not be touched in any significant way.</p> <p>Its numbers appear to be based on Government estimates that are out of date.</p> <p>I support the submission made by BRAG</p> <p>The town cannot.cope with more traffic.</p> <p>There is inadequate provision for Social rented housing. Affordable housing is usually only in the eye of the Developer.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5117
<b>Person ID</b>	1250013
<b>Full Name</b>	Mrs Nikki Bugden
<b>Organisation</b>	Clerk Nash Mills Parish Council
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>At a high level, yes. However, we have comments about the detail in some areas. These are:</p> <ul style="list-style-type: none"> <li>• <b>Housing projections</b> – accuracy of the data used and question fairness of allocation to Dacorum</li> <li>• <b>Green belt</b> – we understand the need for housing but have concerns that over projection could lead to unnecessary use of protected land</li> <li>• <b>Chalk streams</b> – concern about further damage in order to supply water to additional houses</li> <li>• <b>Transport options</b> – the approach to car ownership / usage and associated parking, reliable passenger transport and safe cycle paths</li> <li>• <b>Traffic concerns</b> – how housing developments around Leverstock Green and Junction 8 of the M1 (as well as increased employment at Maylands) would impact traffic through Nash Mills</li> <li>• <b>Density of developments</b> – available internal space for residents, impacts on light and the potential effect on mental health</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5148
<b>Person ID</b>	1264509
<b>Full Name</b>	Hannah Fox
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The vision is contradictory. The amount of housing and development proposed is incompatible with aims within the vision for sustainability of biodiversity and protection of the green belt and adjoining AONB/ Special interest Beeches areas.</p> <p>We need additional housing, especially affordable ones, but the housing targets are based on incorrect projections from 2014 rather than 2018. Using the latter would halve the number of houses required. In addition, more creative use of brown field sites (and a full review of brown field opportunities is required). The pandemic has shown more people working from home and this may actually mean that more people want to live even further beyond the London commuter belt in which Dacorum currently sits. Therefore, the housing numbers need to be completely revisited.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5181
<b>Person ID</b>	1264593
<b>Full Name</b>	Rebecca Mackenzie
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Why are we growing Dacorum to this extent? My understanding is that water supply in this area is already struggling to meet demand. My understanding is that we are due to run out of water in 20 years - have you not spoken to the water companies?</p> <p>Are you sure this is all really necessary? I thought this government was all about levelling up? Developing the North of England. This part of England seems very developed to me.</p>

Given the pandemic, is this not a very strange time to be deciding what the next 18 years of development is going to look like? Surely we need to see what happens economically once we are through the pandemic? Surely this is NOT the time to be making firm and long lasting decisions about this level of development.

YES we need to plan for climate change, but building lots of new, privately owned houses is no way to do that.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5187

**Person ID**

1264601

**Full Name**

Tania Barney

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Central to the draft Plan is the many new homes that will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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'. I do not see how this is an 'exceptional circumstance'. The Council's proposals are neither justifiable or sustainable and this is the core of my opposition to this draft Plan. The central character of market towns of Berkhamsted and Tring are threatened by such a proposal, as well as destroying the natural environment, something which is already under threat.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5201

**Person ID**

1264608

<b>Full Name</b>	Nicola Beadle
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The vision is contradictory. The amount of housing and development proposed is incompatible with aims within the vision for sustainability of biodiversity and protection of the green belt and adjoining AONB/ Special interest Beeches areas.</p> <p>We need additional housing, especially affordable ones, but the housing targets are based on incorrect projections from 2014 rather than 2018. Using the latter would halve the number of houses required. In addition, more creative use of brown field sites (and a full review of brown field opportunities is required). The pandemic has shown more people working from home and this may actually mean that more people want to live even further beyond the London commuter belt in which Dacorum currently sits. Therefore, the housing numbers need to be completely revisited.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5251
<b>Person ID</b>	1264610
<b>Full Name</b>	Deborah Pollard
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The amount of housing outlined in the vision seems excessive, doesn't take into account the potential for brownfield development, social housing or supporting infrastructure.

Overall, plan needs revisiting to align with a post pandemic world with relevant infrastructure in particular public transport, highway connections, traffic volumes & schooling.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS5253

**Person ID** 1175740

**Full Name** Berkhamsted Schools Group

**Organisation** The Berkhamsted Schools Group

**Agent ID** 1175743

**Agent Full Name** Kevin  
Rolfe

**Agent Organisation** Group Director, Development & Planning  
Aitchison Raffety

**Yes / No**

\* Yes

\* No

**Comment**

**Introduction & Context**

Prior to responding to each specific question within this public consultation, it is appropriate to provide some brief background context as to the reasons why it is appropriate for The Berkhamsted Schools Group (BSG) to be engaging with this process.

The BSG is the largest education provider within the Dacorum Borough Council (DBC) area and the largest employer within Berkhamsted. An Oxford Economics, independent schools 2018 economic impact report showed, that at that time the BSG employed 530 local people directly but also supported over 1000 jobs via its activities. The local contribution to GDP was then in excess of £27m and it generated a total saving of over £12m for UK taxpayers as a result of attendance at the BSG rather than taking up a free UK state school place.

The BSG plays a key role in delivering not just excellent quality local education provision but also makes a significant direct investment into the wider infrastructure, which benefits the whole local community. The most recent example of this was the coach and car drop off interchange at Kings Road Berkhamsted which has significantly alleviated local road congestion, enhanced health and safety and encouraged more sustainable travel. The BSG is committed to a masterplan of further investment.

Unlike other landowners, capital receipts generated from any of the BSG's assets, are reinvested back into the community for education; sport; health; well-being and transport infrastructure.

BSG owns land at Haslam Field (site reference BK03) and land at Haresfoot (site reference Cy04), both sites have been proposed as allocations in the DBC draft plan. The draft local plan proposes BK03 as a housing allocation with the existing sports pitches on the front part of the site being relocated to a significantly enhanced playing fields provision at site Cy04.

BSG has engaged openly and positively with DBC and other stakeholders throughout the local plan review process and will continue to do so. A comprehensive submission was previously made to the Issues and Options Consultation in 2017. This included a detailed supporting planning justification statement; a BSG justification document and an Equivalent Quality Assessment of the current sports facility compared to those proposed, prepared by specialist consultants. This demonstrated the substantial enhancement in sports provision that would flow from this project and was supported by Sport England.

It is relevant to state that the general ethos and approach of the BSG is to “support” DBC and to “respond” to their growth strategy.

BSG will play its part to help deliver on local education and wider community infrastructure improvements that flow from the final level of growth that is adopted by DBC.

**Do you think the overarching vision, the vision for Dacorum’s places and the strategic objectives are right for the Borough?**

The BSG supports DBC in their policy “Overarching Vision for Dacorum's Growth by 2038”. The BSG commends the principle that growth is delivered in a sustainable way, which links homes, jobs, infrastructure, education, health and wellbeing. The BSG will play its part in helping to assist this delivery by continuing to invest to improve its already excellent education offering and to implement continued infrastructure investment to the benefit of the wider community. The relocation of the Haslam Field playing pitches (site BK03) to a significantly enhanced sports offering at Haresfoot (site Cy04) will significantly improve health and wellbeing.

The BSG also supports DBC’s “Vision for Dacorum’s places”. In particular it supports the fact that Berkhamsted, being the second largest town in the Borough, can support growth linked to sustainable improvements and infrastructure investment.

The BSG agrees with all the “Identified strategic objectives” below, and there is a synergy with many of the BSG’s own values:

- Delivering Dacorum’s future with homes for everyone
- Generating a vibrant economy with opportunities for all
- Mitigating and adapting to climate change
- Conserving and protecting the natural environment
- Ensuring an attractive and valued built and historic environment
- Promoting and facilitating sustainable transport and connectivity
- Supporting community health, wellbeing and cohesion
- Enabling the delivery of infrastructure

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5298
<b>Person ID</b>	1264048
<b>Full Name</b>	Alison Fraser
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I don't agree with some aspects of your vision and the aspects that I do agree with, I don't trust you (and the developers) to deliver. You're wrapping up as attractive loss of green belt, by calling the new housing estates 'garden communities'. We all know this will not be the case. They will have small gardens and there will be no compensation for loss of the greenbelt and wildlife. Where I live I often hear owls at night; I won't once the green belt near where I live has been built on and what will happen to these owls? Whilst there are brownfield sites; no green belt or green fields should be built on and then only if the need for that type of housing can be fully justified. You say that we will not be able to meet the needs for employment. There really should be enough employment for people who can't afford to commute. You say that we won't have all the infrastructure that we need. Therefore, why have more housing here and not local to where the infrastructure will be? I presume included in the lack of infrastructure is a General Hospital with A&amp;E. It is essential that if we are to have more housing, we have to have local facilities including a decent hospital with an A&amp;E. This could be a hospital on land that is located near where the boroughs of Dacorum, St Albans, Three Rivers and Watford meet. It is unreasonable to increase the population without a local hospital. Your vision says that housing projects will be carefully thought out. Is this really going to happen? I live near one of the green belt sites that have been listed in the local plan and already developers have put a leaflet through the door with a plan of what they want to build and including some misinformation to make the project (money making scheme) more attractive than it is.</p> <p>With Brexit and the pandemic how do we know how many houses and what type will be needed? Will we need more care homes when new strains of the virus may reduce life expectancy? Most of the current care homes in Dacorum have vacancies. We do need more good quality, affordable social housing, rather than houses that are unaffordable for most people, despite being labelled as 'affordable'. Young people are already struggling to afford properties and have to pay high rents. I don't agree with people who buy the new houses subsidising the local infrastructure; as this just makes the properties even more unaffordable for the average young person. The Marchmont fields have been earmarked for housing for several years now. As no homes have been built, it does make me question whether there is really a need for new</p>

homes; or whether new homes are just not being built because not enough people can afford them. Who will decide what developer will build on a site? Many developers have their own agenda (making as much profit as possible and not necessarily building the best value for money houses). Developers will want to build on the land options that will provide them with the most profit; and not necessarily where the houses are most needed or will be most affordable. You say that you want town centres to be 'vibrant'. Where I live in Bovingdon the village centre is very congested. Why make it more so? There is nothing included in the leaflet from a developer, who wants to build 150 properties on green belt that has been earmarked in the plan; that will make the village centre less congested; although it will make it more congested. Your plan says that there will be 'additional and improved local community facilities'. In Bovingdon there is an area earmarked for a new school (and that the old school land will be used to reduce congestion on the high street). However, even the parish councillors are saying that a new school will not be built, on the land earmarked, certainly within the timeframe to 2038. It just feels that whatever is said in your vision; much of it will not materialise in practice; or be a very watered down version of your vision. For example, the new community facilities at the Manor Estate were not built, despite being promised to sugar coat the new development there.

In your vision you want 'high quality walking and cycling infrastructure'. How is this going to be provided? Why are homes being planned for Bovingdon (for example), without any plan to have a safe walking and cycling route to the train station, which is only two miles away?

There is not enough emphasis in your vision about building on brownfield sites. These should be built on first.

How in your vision will you keep property affordable for future generations?

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5313

**Person ID**

1264616

**Full Name**

Philip Daw

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

<b>Comment</b>	<p>The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in Berkhamsted. This will result in a massive increase in traffic/congestion, with poorer air quality.</p> <p>DBC declared a climate emergency more than a year ago. Despite this, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency.</p> <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>Nearly all development proposed will be on Greenbelt. – this is against Government policy.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5319
<b>Person ID</b>	1264599
<b>Full Name</b>	Mike Keeble
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Using Greenbelt land for development, must absolutely be a last resort, what evidence has been provided to show that all opportunities to recycle already developed land (in the borough and neighbouring areas) have been exhausted? How does the use of so much greenbelt land address the effects of a global climate emergency?</p> <p>The plan claims to offer a sustainable vision, this is not supported by evidence and is therefore contradictory.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5375
<b>Person ID</b>	1264628
<b>Full Name</b>	sophie boden
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I find the level of information and jargon here overwhelming and depressing. Dacorum having 'built on its strengths and the opportunities to deliver balanced communities'. This is a fancy way of saying we are going to pave over the green space because we can.</p> <p>The overarching vision is terrible. You acknowledge a climate emergency, so you intend to resolve it by building on Darorums green belt. You are completely at odds with yourself. I strongly object to your lack of thought here. How is destroying the environment helping? I find it upsetting you can reference health and wellbeing - how is increasing pollution (which comes with more cars and more infrastructure) helping wellbeing. Particularly when lots of your proposed sites are not within easy walking distance of amenities, therefore encouraging people to drive and not walk, both increasing pollution and obesity related health issues.</p> <p>If you were actually thinking about the future maybe you would be looking to inovate and reuse land that is in disrepair to address some housing.</p> <p>Also, with the pandemic and increase in remote working there is less demand for commuter town development so here you are creating too much housing.</p> <p>I agree Hemel needs to be reinvigorated but this plan has not asked the people of Hemel why they moved there, or why they choose to stay there if they grew up there, in order to understand how to improve and continue to attract people.</p> <p>Consulting people during a pandemic is, I'm sorry, ridiculous.</p> <p>You will only get responses from people online, meaning you immediately cut out a significant portion of people.</p> <p>Most people with children are severely stretched and have no time to dedicate themselves to reviewing the masses of documents.</p> <p>You should reconsult when you can actually go and speak to people. This is really poor and I will be complaining to my MP.</p> <p>Your plans for Berkhamsted do not plan for sensitive views. They destroy current views. You will be ruining mine and my neighbours lives by your plans. I will never be able to let my children play in the quiet secure area in front of my house at the weekend because you plan to put 90 dwellings behind my house accessing using a road that is currently closed at the weekend. How can you do this? This will ruin my children, one of whom has respiratory issues. Do you not think of the individuals when you decide to expand across half of the county?</p>

With Berkhamsted, where do you propose any amenities will come from? The nearest school in the South (Greenway) is massively oversubscribed (it is a 6 minute walk from my house and yet my child did not get in). Meaning that she was assigned to the next school with capacity (Victoria) which is an 18 minute walk. The road down to the school is always heaving with cars when I walk my child to school and no doubt putting significant further dwellings in the south will only add to this congestion, therefore further polluting the town, destroying any animal habitats left and making the walk to school more dangerous.

It is laughable that I am having to consider driving my daughter to avoid the constant fumes on the hill. I am unsurprised when I see parents doing this, as this is a no win situation.

Describing Tring as growing is an understatement. You are suggesting to increase the size by a third. How will it be supported by schools, GP and other amenities. Again you should stop and reconsult because Tring residents need the ability to actually have this presented to them coherently so you can gain their views on this.

I would suggest you reconsider the proposal and think about alternatives, consulting with people after lockdown, when people have time to properly respond and when it is safe to do so. I suggest you think about creating Bulbourne Cross instead as this looks far more environmentally sustainable and thought out.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5407
<b>Person ID</b>	1264636
<b>Full Name</b>	Lynsey Bilsland
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The vision and strategy as written are not right for Berkhamsted. The planned new housing will have a significant negative impact on the town, overwhelming the existing infrastructure. Particularly the development along Shootersway cannot be sustained with the existing roads, with only two decent roads into town, one single track and two country lanes. Access to shops, schools and doctors will be difficult. Getting to the new schools planned will require driving as will getting into town, new residents will not walk from shootersway. This will ruin the Greenbelt and make the town a significantly less

pleasant and inclusive place to live. other than a new car part, it is not possible to improve transport in central Berkhamsted and given it's location in a valley, cycling route to the Shootersway area are not likely to be popular.  
The justification for this size of development or the development of Greenbelt land is not there and growth of Berkhamsted on this scale is unsustainable.

**Included files****Consultation Point** Borough Vision to 2038**Comment ID** EGS5444**Person ID** 1264647**Full Name** Richard Burnell**Organisation****Agent ID****Agent Full Name****Agent Organisation****Yes / No** No  
\* Yes  
\* No**Comment** The current plan does not address the changing needs of the towns post Covid19. A review of empty retail units in high street and out of town retail park locations should be undertaken consideration should then be given to redeveloping brownfield sites before the proposed rural sites.**Included files****Consultation Point** Borough Vision to 2038**Comment ID** EGS5446**Person ID** 1264591**Full Name** Kim Baiden**Organisation****Agent ID****Agent Full Name****Agent Organisation****Yes / No** No

<p>* <b>Yes</b></p> <p>* <b>No</b></p>	
<p><b>Comment</b></p>	<p>Building homes for all. Yes, it is appreciated that there is a need for new homes, but so many? The average house price is over £400,000 in this area. What proportion of the homes are going to be sold for considerably (say 50%, which is probably what the average youngster can afford) less than this? Where are all the people coming from who are going to fill these houses? Where are they going to work? Where are the doctors coming from to provide health care? Where are the teachers coming from to provide the education for the huge influx of people? How many more cars are there going to be on the road polluting the environment and contributing to the poor air quality and climate change.</p> <p>This year we have seen a huge problem with flooding both in Tring and the surrounding villages, how can building so many new homes help alleviate this. The fields where the proposed houses are going have been deep in water over the last few weeks. Where is this water going to run off to? How can this make the environment greener with hundreds more cars giving off fumes on our already over crowded roads.</p> <p>A vibrant economy is going to require places for people to work. We chose to live in Tring because it's a beautiful market town full of history. It is vibrant and there are already many opportunities, not least of which is to enjoy the beautiful countryside which, if your plan goes ahead, is going to be swallowed up by bricks and concrete.</p> <p>How is this making happier, healthier safer place to live? No space to thrive, thousands more people living on top of each other, fighting for local services.</p> <p>We don't want to see more shops and shopping malls. All those small businesses who have worked so hard to keep going over the coming months will be challenged further.</p> <p>It looks like we will be losing some of our beautiful historic buildings. Whilst none of us like change, we don't want our town to become another featureless town the size of a small city.</p> <p>This proposal will completely change the whole nature of the town and what makes it such a special place to live.. It will have a detrimental effect on the surrounding villages, increasing traffic and causing yet more damage to the small roads which are already in a bad state of disrepair.</p> <p>This needs to stop before it completely ruins our wonderful corner of Hertfordshire.</p>
<p><b>Included files</b></p>	
<p><b>Consultation Point</b></p>	<p>Borough Vision to 2038</p>
<p><b>Comment ID</b></p>	<p>EGS5530</p>
<p><b>Person ID</b></p>	<p>1264657</p>
<p><b>Full Name</b></p>	<p>Amanda Hutchinson</p>
<p><b>Organisation</b></p>	
<p><b>Agent ID</b></p>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>3.6 The objectives are mutually exclusive. It is not possible to protect the environment while building on green belt land and massively expanding Tring, Berkhamsted and Hemel Hempstead.</p> <p>Tring station is outside Tring and it idealistic and unrealistic to think that people will cycle to the station. 2,000 new homes will mean a massive increase in cars driving to the station, emitting exhaust fumes and contributing to greenhouse gas emissions. Dacorum has failed to provide an adequate cycle path to the station (the road floods and cyclists get drenched with spray when it rains) and I see no reason to think that they can do better in future.</p> <p>The previous commitment to maintaining the linear valley character of Berkhamsted has been dropped and protection for the green belt ridge areas abandoned. This is a retrograde step.</p> <p>No account has been taken of the current use of green belt land for recreation, especially walking. The plan removes local areas used for exercise, potentially forcing people into using cars or other environmentally damaging transport to access the countryside for exercise.</p> <p>The plan will result in a massive increase in car movement in the areas where new housing is proposed - principally Hemel Hempstead, Berkhamsted and Tring. The market towns of Berkhamsted and Tring do not have the infrastructure to deal with this nor the possibility of improved infrastructure, so the result will be increased congestion and, in consequence, increased carbon emissions. There are geographical constraints in these areas which have not been considered in the plan.</p> <p>There is no explanation of why the far more reasonable 2013 Core Strategy has been so drastically altered.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5533
<b>Person ID</b>	1264651
<b>Full Name</b>	Tom Beecroft
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>Most notably for me, the vision doesn't even recognise the village of Northchurch, despite it's own Strategic Objective to "Promote distinctiveness of each of Dacorum's towns and villages", whilst proposing developments that would fundamentally impact it.</p> <p>The proposed development East of Darr's Lane (BK06) would be catastrophic and irreversible, fundamentally changing the character of the village of Northchurch in which I have chosen to live and raise a family. It would constitute an urban sprawl which would diminish Northchurch's status as a village completely and the unnecessary loss of important Green Belt land.</p> <p>We chose to live in Northchurch due to it's proximity to open countryside and surrounding open spaces and are able to access Berkhamsted town centre by bike, via the tow path. There is a strong community in the village which we have come to value deeply.</p> <p>The proposed developements would change everything for me and my family: Loss of community; Loss of village character; Loss of open and space. All of these would have a devastating impact on our mental health and wellbeing.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5587
<b>Person ID</b>	1263380
<b>Full Name</b>	Martin Warden
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<ol style="list-style-type: none"> <li>1. Far too many dwellings are scheduled for Tring. The number is disproportionate to the size and nature of Tring. It is clearly not appropriate or well thought out to put such a high proportion of Dacorum's dwellings target into one small town which has such limited viable space and such Protected site status.</li> <li>2. The proposed new areas of building are approximately as large as the existing areas. This does not apply anywhere else in the Dacorum plan area. It will swamp the town and change its character irreversibly.</li> </ol>

3. The proportion of affordable housing is too high. The nature of this "affordability" will constitute social engineering of an unacceptable type and proportion.
4. The development locations proposed are in the wrong place. Squeezing everything into the areas between existing built up areas and the canal and across to the A4251 destroys the "we live in the country" nature of the town and decimates the "what a pleasant place to live" aspect of the town entrance along the road from Berkhamsted.
5. They destroy the "pleasant country walks" currently starting from the edge of the built up areas and along Station Road as the way to to the station. The views from these walks will be replaced by buildings and housing estates.
6. The declared intention to encourage walking and cycling will be set back rather than enhanced. Change the pleasant walk to the station into a long walk through a built up area and you will increase the use of vehicles for this purpose.
7. The roads and junctions on the east side of town are already overloaded and problematic and space is not available to improve this. Putting so much extra traffic on them will make the situation a much worse.
8. Development as smaller sites should be found elsewhere in Tring where there is space for properly designed and well laid out development preferably which already have the basic access to the A41 for transport to both Berkhamsted and Aylesbury and with existing vehicular and personal routes to Tring Station. Areas on the west side of Tring are also in line with the main cross-town roads to the High Street and the recreational aspects of the. Conservation area and Tring Park. Such journeys would logically be made by walking or cycling.
9. Housing developments on the east side will result in much more vehicular traffic across the towns residential areas and will cause even more congestion at the entrance to and in the high street heavily discouraging use of the shops and services there.
10. We have studied carefully the comments made by Tring Town Council with regard to the unsuitability of the green belt areas selected and their effect on the AONB and the Beech Area SAC. We agree completely and can only imagine that the green belt areas east of Tring have been selected without proper research or deliberation and with no demonstration of proper supporting proposals. Such proposals must surely be ruled against at Judicial Review and would be the subject of long and expensive litigation. The people of Tring feel so strongly about this that they would join together to fund such legal actions.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5592
<b>Person ID</b>	1144878
<b>Full Name</b>	Mr Peter Moore
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The aspiration for Tring fails to acknowledge its current inclusivity that meets current needs and expectations. Growth will be neither achievable nor sustainable unless present infrastructure is significantly improved. Further, the objective of development in the green belt contradicts the assertion of desired sustainability. Open space - green belt in particular - currently exists. To assert new open space will be provided is clearly unachievable because of planned development on existing open space. There are currently, and for the foreseeable future, brown field sites available for development. These should be prioritised over existing open spaces.</p> <p>Dacorum has significantly exceeded new build targets. There is no case made for future development of the magnitude intended.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5593
<b>Person ID</b>	1264679
<b>Full Name</b>	Paul Firth
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5625
<b>Person ID</b>	1264689
<b>Full Name</b>	Philip Hobden

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5653
<b>Person ID</b>	1264710
<b>Full Name</b>	Jess Malcolm
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No

<b>Comment</b>	This is a home for wild creatures and a place where families can explore and learn within nature. This growth will not benefit the community. We need to find strategies to work together to save our planet and its creatures not help to destroy it.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5665
<b>Person ID</b>	1264708
<b>Full Name</b>	John Malcolm
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>I agree with much of the plan however, as a resident of Berkhamsted, I find the vision for Berkhamsted to be short-sighted and limited and plans to fill inland on the outskirts ill-considered. Have councillors walked close to the bypass at the tops at which housing is planned? - Have traffic volumes been measured?</p> <p>What are the plans to improve utilities and infrastructure to support this housing increase or will increase the population without developing infrastructure and community resources again! - On balance my preference is for the Bulbourne Cross development as the developers have given more consideration to the needs of a growing community of Berkhamsted and seriously considered environmental concerns, building better quality properties suited to protecting the environment whilst improving necessary community resources</p> <p>I would like to see less housing development but understand the need to build more accommodation in Dacorum. I would rather DBC to maximise the use of brownfield sites and improvements to some existing ageing housing stock, including social housing stock across the Borough.</p> <p>I would like to be confident that DBC will hold contractors to account and planning proposals rejected should they try to short cut any environmental sustainability/requirements and have concerns that the current plans are not adequate to allow DBC to evidence its commitment to reduce global warming</p> <p>I would like to see a better commitment to encouraging cycling including more provision of cycle lanes for local commuters to reduce the need to use cars and better public transport to outlying villages</p>

I am not clear what plans DBC has to develop waste management sites that are accessible for all with good recycling stores on site, such as Buckinghamshire's site on the A41 - we should not be required to climb steps to deposit waste at our local sites - I agree that the priority should be to focus on prevention first and look forward to seeing a better waste management strategy in Dacorum

I would like to see facilities for youth sports teams improved in Berkhamsted including Raiders - availability of playing fields and recreation areas is already too limited in areas of Berkhamsted

I would like to have had more time to consider these plans and to be able to visit a consultation site rather than having to read this document online to be able to clearly see the planning maps as those provided in the booklet are unreadable

Finally, if I lived in Ebbens Road, Apsley, I would be very concerned re plans for any further housing development, which is already a dangerous road to negotiate in a car!

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5667

**Person ID**

1264405

**Full Name**

Natalie Beecroft

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Most notably for me, the vision doesn't even recognise the village of Northchurch, despite it's own Strategic Objective to "Promote distinctiveness of each of Dacorum's towns and villages", whilst proposing developments that would fundamentally impact it. Northchurch is a special place with environmental and historical uniqueness as hightlight by the Berkhamsted Mayor, Garrick Stevens, in his response to the Local Plan and the Northchurch Parish Council's response to the Local Plan.

The proposed development East of Darr's Lane (BK06) would be catastrophic and irreversible, fundamentally changing the character of the village of Northchurch in which I have chosen to live and raise a family. It would constitute an urban

sprawl which would diminish Northchurch's status as a village completely and the unnecessary loss of important historical and geographical Green Belt land.

We chose to live in Northchurch due to its proximity to open countryside and surrounding open spaces and are able to access Berkhamsted town centre by bike, via the tow path. There is a strong community in the village which we have come to value deeply and participate in with other residents, the church and the school.

The proposed developments would change everything for me and my family: Loss of community; Loss of village character; Loss of open and space. All of these would have a devastating impact on our mental health and wellbeing.

In an era (especially post COVID) of mental and physically well-being being vital through neighbourly and community relationships and connections to the environment, increased and unestablished population rise through housing and development will permanently damage this essential life line.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5679

**Person ID**

1264715

**Full Name**

Kate Le Gassick

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Obviously the ambitious goals to achieve a great local economy, that is clean, green, healthy, well connected etc. are what everyone wants for their local area and for the country as a whole. However, I think the size of expansion of is too much and it is difficult to reconcile how we can achieve themes 3 and 4 by building on so much of the green field areas.

Most importantly I wonder if it's realistic to proceed based on the evidence gathering to date given the significant interposing event of the Covid Pandemic. Will so much housing really be required in this area? With more people working remotely for all or part of the week there are already signs to suggest that people are looking to other areas of the country, rather than the continued requirement of being within a relatively short commute to London.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5687
<b>Person ID</b>	1264697
<b>Full Name</b>	Nicholas Wood
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I cannot support this; it sounds lovely on paper, but the new housing proposals are absolutely not 'in sustainable locations'. Such vast numbers of houses will not 'help reduce the Borough's contribution to climate change' and with so much green belt land built over I don't think we can say that 'the countryside will have been actively managed', it will have been destroyed by being concreted over!
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5693
<b>Person ID</b>	1263239
<b>Full Name</b>	Robert Farrer
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	The data available to the planners is no longer valid. The huge social and economic changes brought about by Covid 19 have rendered the starting assumptions hopelessly optimistic. The consultation period should have been extended. The proposed burden of new building in Berkhamsted, Northchurch and Tring would completely alter the nature of these settlements. The need for new housing on this scale has been greatly overestimated in the context of the above changes.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5701
<b>Person ID</b>	1258030
<b>Full Name</b>	Amy Harman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I object to the fundamental strategy of this plan to provide 16,899 new dwellings in dacorum with approx 10,000 on Green Belt land. This is entirely at odds with the overarching vision to create environmentally sustainable growth. These figures are wrong and need to be challenged, they are far too high  The impact this quantity of development on existing green fields will have on the environemnt and infrasturcture will be devastating and will result in extreme traffic congestion, water supply issues loss of wildlife, increased pollution, increased light pollution and will not conserve the local environment but destroy it.  Building on vast swathes of open green belt land will have a disatrious impact on the natural beauty of the area, in particular, the CAONB. The views of this distinctive landscape will be ruined for future generations and should be preserved. The proposed developments merges Berkhamsted and Northchurch thus destroying these distinctive individual settlements. The Green Belt land in between these settlements currently preserves these historic settlements.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5717
<b>Person ID</b>	1264730

<b>Full Name</b>	Gabriel Heaton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	This plan for extensive housebuilding in the region is completely inconsistent with environmental sustainability and is self-evidently driven by economic factors. It will result in the destruction of the character of the area, degradation of the environment, and pays no serious attention to likely future problems caused by climate change, e.g. water shortages.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5719
<b>Person ID</b>	1264678
<b>Full Name</b>	Tom A
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5735

**Person ID**

221837

**Full Name**

Mr Robert Wakely

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The draft Dacorum vision and strategic objectives fail to show:

- how to meet the desperate need for more affordable and social housing for our young people, as well as the teachers, NHS staff and carers, and other workers we need to live and work in this community;
- how to ease the pressure on Berkhamsted and Northchurch's creaking infrastructure (public transport, cycling and walking, roads, parking, schools and playgrounds, GPs, sewers, water and utilities) from recent housing developments, let alone the demands of further housing development;
- how the impact of the pandemic on future demand for commercial and residential property will change the balance of land use in town centres;
- how further housing development out of town centres is consistent with the stated aim to protect and enhance the environment, the countryside and the opportunities for recreation that local people love about where we live;
- how the community can be guaranteed that new housing will be developed sustainably meeting the highest environmental standards; or
- how development will avoid associated traffic worsening congestion, air pollution and road safety in Berkhamsted, Northchurch and Tring.

**Included files**

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5766
<b>Person ID</b>	1264473
<b>Full Name</b>	Jane Read
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Your proposals for Tring and for a huge development at Long Marston will do irreparable damage to these areas of Dacorum and are a disproportionate response to government requirements. In relation to your proposal to include a huge development outside Long Marston in the Plan, I particularly challenge your statements that "All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.", that you will have been able to "facilitate[d] a significant increase in sustainable travel modes" - at Long Marston car transport would be the only viable transport option, and "the varied character of the countryside will have been enhanced, and continued to be admired and cherished" - at Long Marston you will have destroyed its particular quiet, rural character and negatively impacted on its historic environment. In addition, the development would have a negative impact on the nearby Chiltern AONB
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5775
<b>Person ID</b>	1264741
<b>Full Name</b>	pete
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5799
<b>Person ID</b>	1264750
<b>Full Name</b>	Neil Joyce
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	<p>The plan was written prior to the vast changes caused by the COVID pandemic. This has altered the way that we live and work, and looks to continue to change the way businesses operate going forward.</p> <p>I would recommennd that this plan is re-submitted with these lifestyle changes reflected in its content.</p> <p>Tring and Berkhamsted are mistakenly lumped together as Market Towns. They are in fact very different in character. Berkhamsted is a vibrant and affluent commuter town, whilst Tring is a destination of choice for visitors; offering a wealth of cafe's and restaurants to feed the visitor. Tring has a large number of independent shops which, during the past 12 months of restrictions, have largely made the town self-sufficient. This diversity of small retail outlets should be encouraged because that is what gives the town it's unique character.</p> <p>I am concerned that th eincursions into the greenbelt on the edge of the area of outstanding natural beauty around Tring will spoil the views both into and out of the town which currently enjoys being contained within a hollow, and does not impact the panorama of the surrounding landscape.</p> <p>New woodlands are no replacement for the biodiverse historic hedgerows and woods. You state that Dacorum's vision is to protect the landscape and biodiversity - this is at odds with the intention to re-classify greenbelt for development. A net gain in biodiversity is not the same as preserving and managing the current landscape.</p> <p>Cycle lanes are only as good as the quality and safety of the surface. As a cyclist myself I am concerned that they are put as an afterthought, sharing space with pedestrians. The assumption that all short journeys will be by sustainable means (walking or cycling) is a misguided assumption in this and age where households own multiple cars.</p>

I must emphasise that the definition of Tring as a market town is an outdated view. To retain the distinct character of Tring, any development that adds to the size of the town will impact the feel of the town. It is already seeing the visual impact of the Roman Park development on the western approach to the town.

The planned growth for Tring is out of proportion with the current size of the town, and will severely impact the ambience and feel of the community. The large development planned for the east of the town will not come without a visual impact, and despite all the good words about walking and cycling, the vast majority of the proposed new inhabitants in what will be an exclusive development of large houses, will not be inclined to ditch their cars in order to visit the town centre.

The need for a business hub should be questioned in the emerging era of working from home becoming the norm

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5812

**Person ID**

1264751

**Full Name**

Simon Strong

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The Local Plan is contradictory in that it identifies large areas of Green Belt for development, whilst also claiming to support its vision for benefiting communities and the environment. It significantly underestimates the negative impact of these proposals.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5818

**Person ID**

1264755

**Full Name**

Jane Edmonds

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I think the plans actually constitute overbuilding in the area - with too little emphasis on infrastructure to support this. Plus its a decimation of the green belt that makes this area pleasant to live in.</p> <p>I believe we need more affordable housing (and supported house rentals for families- not all flats as seem to be being built at the moment) but do not think this plan will provide this.</p> <p>I do not believe such overbuilding will provide needed affordable housing or affordable rental opportunities for local residents - it is more likely to attract people from London or other areas and potentially increase house prices.</p> <p>Also - while understanding the need to address climate change - enough parking is never allowed for in these new developments - which does not discourage people from having cars (which is the aim) but causes parking issues on all surrounding roads and areas - electric or otherwise people will still own cars and need somewhere to park them.</p> <p>Also making the area overcrowded will adversely affect the quality of life for current residents with services, roads, trains etc becoming busier and overstretched.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5820
<b>Person ID</b>	1264752
<b>Full Name</b>	Chris Brown
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	<p>A disappointing Borough Vision to 2038 for the following reasons.</p> <p>The Borough Council knows the Local Plan has been written in accordance with current Government guidance which dates from 2014. It fails to take into account the recommendations of the National Planning Policy Framework (NPPF) which expects Dacorum to use latest information which is from 2018. ONS projections based on 2018 data indicate an annual need for around 350 dwellings per annum in Berkhamsted. This is substantially fewer dwellings than the current plan proposes. DBC should challenge the proposed numbers which represent over -development and huge impact on AONB and are based on outdated (2014) housing projections.</p> <p>The current Borough proposal is for 5,954 homes which will be in "greenfield growth areas" known as Green Belt and most of it on the outskirts of Berkhamsted. 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, therefore the Council's proposals neither justifiable or sustainable.</p> <p>When I read the Themes underpinning the Strategy I fail to see how such a massive expansion could ever be justified as helping ensure a 'happier, healthier and safe dacorum' or 'Creating a clean, green and attractive Dacorum' for example!</p> <p>I also consider the consultation portal as the principle mechanism to submit responses as difficult and obtuse to navigate, whether by design or otherwise. For example the header question in some sections was asking if you had a comment whereas others asked if you agreed with the DBC findings. It needed careful review to avoid mistakes. Most residents will also not quote specific paragraphs from the Local Plan when responding, though the objections and points being made will be loud and clear. I hope this will not invalidate their submissions.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5852
<b>Person ID</b>	1264768
<b>Full Name</b>	Paul Shepherd
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5873
<b>Person ID</b>	1264354
<b>Full Name</b>	Juliet Penaliggon
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The vision is contradictory. The amount of housing and development proposed is incompatible with aims within the vision for sustainability of biodiversity and protection of the green belt and adjoining AONB/ Special interest Beeches areas.</p> <p>We need additional housing, especially affordable ones, but the housing targets are based on incorrect projections from 2014 rather than 2018. Using the latter would halve the number of houses required. In addition, more creative use of brown field sites (and a full review of brown field opportunities is required). The pandemic has shown more people working from home and this may actually mean that more people want to live even further beyond the London commuter belt in which Dacorum currently sits. Therefore, the housing numbers need to be completely revisited.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5921
<b>Person ID</b>	1264783
<b>Full Name</b>	Deborah Vidler
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Comment</b>	<p>The strategic objectives are admirable, but the detail of the plan fails to meet and often contradicts the stated objectives with many areas vague, unambitious and unimaginative.</p> <p>Mitigating and adapting to climate changes - but only vague indications of 'encouraging' low carbon etc. Need to see references to the council's own carbon neutral commitment and mandates on for example inclusion of renewable energy.</p> <p>Conserving and protecting natural environment – in Tring you are proposing to build on the green belt and offering very little detail of how you will even attempt to mitigate this!! Development on the green belt should be the absolute last option, and if it is to be done then it deserves ambitious and well thought through targets for mitigation. The plan offers only vague suggestions of wildlife corridors which won't even come close to replacing what will be lost. You mention retaining trees in development sites, but it is in fact the hedgerows and grasslands which hold much of the biodiversity. I support Tring in Transition's Tring Fields' proposal of creating developments within existing field boundaries to retain hedgerows and create smaller scale developments with the distinct character the plan claims to be aiming to create.</p> <p>Attractive and valued built and historic environment – I see little evidence of this in the proposals for Tring. The phrase 'local distinctiveness' is repeated throughout the plan with little reference to what this even means for Tring. It is a market town with a vibrant range of independent high street shops and cafes, it is wholly out of character to place a medium to large supermarket adjacent to the town centre!</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5924
<b>Person ID</b>	1264785
<b>Full Name</b>	Thomas Lloyd-Evans
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	<p>This plan ruins the green belt, destroys the character of Tring and Berkhamsted, and should be rejected.</p> <p>As the local resident association points out: The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or</p>

resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5930

**Person ID**

1264772

**Full Name**

Adrian Slade

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The Council's Vision is highly laudable in terms of vision and strategic objectives - a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected.

However, the plan appears to largely focus on building new homes and where they are to be located. There is little underpinning rationale to suggest that the increase in total dwellings is sensible or even sustainable.

For Tring specifically, where I live, there is a proposed increase of 2,700+ new houses increasing the size of Tring by 55%. Most of this housing will destroy much of Tring's surroundings and Green Belt - uprooting ancient hedgerows and trees and negatively impacting the quality of our countryside, wildlife and environment. I also understand that the focus on building on Green Belt is counter to national Planning Policy and the government's position that Green Belt should only be developed in exceptional circumstances. The Council makes no effort to explain what the exceptional circumstances are in Dacorum and this needs further explanation before any approval can be given.

Furthermore, in Section 1.30 'Working with Others', the importance of cross-boundary matters is noted. However there is little evidence of this being applied in my local area. Tring is bounded on two sides by Buckinghamshire whose plans have a direct and significant bearing on employment, traffic, local land use, etc. There appears to be no reference to Aylesbury Vale District Council or Buckinghamshire, and few to local villages in that county, contrary to NPPF para 35c. For example the planned development of RAF Halton is proposing c1000 new homes and is only 4-5 miles from Tring. This is a concern that may have led to potentially flawed conclusions on matters ranging from employment to the siting of additional retail.

The proposed growth requires a more robust stance in my opinion to ensure that the plan does not adversely impact the environment and climate, for example by referencing DBC's Climate Emergency Declaration and zero carbon target of 2030. Also, the proposed growth suggests substantial additional traffic with over an additional 3-4000 cars to the locale plus the necessary lorries and delivery vehicles associated with such a growth.

In Section 2.12 'Vibrancy of Town Centre' there is little consideration to how to retain the local personality of towns. Tring has a very "market town" distinctiveness and there is no opportunity or plan to maintain / enhance this within the proposals especially given the need to support a larger local population. As suggested by others there are over 20 references to the importance of local distinctiveness in the Plan, e.g., page 22: *'All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.'* I strongly support this position but, as mentioned above, am concerned that there are no references to what makes Tring distinctive, or to a process by which that will be agreed and at what stage it will become binding within the plan.

I strongly feel that this needs to be formally addressed. Placed at an important ancient crossroads, Tring's market heritage is deeply rooted, it has a track record of many 'firsts' including clean water supply, land set aside for public amenity and nature conservation and water and wind-based energy generation and is also located in the midst of more SSSIs and officially designated natural beauty than other locations in Dacorum.

Can we please have some specific local questions addressed to help understand what the plan means for our local places? E.G

- How will the viability of Tring as a market town be maintained with such an increased population and associated pressure on a town centre that will have to accommodate more traffic?
- How can sensitive views and landscape be maintained?.
- How will green spaces be re-purposed for the community to enjoy? For example,
  - There is no joined-up cycle and footpath plan for Tring and there are gaps where this extends beyond residential or connecting streets.
  - There is no suggestion of any "re-wilding" to compensate for the loss of local green spaces

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS5961

<b>Person ID</b>	484226
<b>Full Name</b>	Mr Matthew Allen
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I understand the target for the South of England is to be revised and hence my expectation is the number of properties required should be revised downwards.</p> <p>Given I have no clarity regarding this revision I will have to comment on the proposal as published.</p> <p>The sheer number of new properties and associated infrastructure revisions is extreme and inappropriate for the size of the the area. Every area of green appears to have been highlighted as a potential candidate for new development.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5968
<b>Person ID</b>	1264797
<b>Full Name</b>	Robert Diehl
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	In reality the borough plan is only about how many homes will be built and where they will be located.

The council has accepted what they believe to be a central government requirement for the number of homes to be built in the borough without any challenge of resistance. The numbers represent an increase of 114% over the 2013 Core Strategy and will result in a very large number of homes being built on what the Council terms "greenfield growth areas", which is essentially Green Belt land, mostly on the outskirts of Berkhamsted and Tring. The Council has ignored national planning policy contained in the NPPF and statements by Ministers and the Prime Minister, that the Green Belt should not be developed except in "exceptional circumstances". The Council does not explain what the exceptional circumstances are in this case. The Council's proposals are not justifiable or sustainable.

The plan will ruin the character of our market towns and villages and result in the loss of Green Belt to development forever.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS5972

**Person ID** 1145998

**Full Name** Mrs Pauline Hughes

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS5985

**Person ID** 1264795

**Full Name** Alan Stanley

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Far too much building in Hemel Hempstead. Would result in loss of important green belt and busier city type feel to town with infrastructure that cannot cope as well as more overcrowding and crime.  This many extra dwellings cannot be justified in the town.  There would not be enough extra parks or sports fields to cope with influx of new residents.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS5989
<b>Person ID</b>	1264763
<b>Full Name</b>	Corran Griffin
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	How can environmental sustainability be acheived when over 2000 acres of Green Belt will be lost? These 2 things are in conflict with each other.  How can the countryside and other small villages be "protected from devlopment" when Hemel Garden Communities builds right up to the edge of the Ashridge AONB and builds on current fields and agricultural land?
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6020
<b>Person ID</b>	1264822
<b>Full Name</b>	JULES GARNER

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>1 There is an over-provision of housing based on inaccurate and superseded The plans are based on out of date ONS data so the yearly targets for associated housing development are significantly too high.</p> <p>1 Dacorum Borough Council has declared a climate emergency and indicated that this should be central to any future plans for the This local plan does not do that, but prioritises economic growth and greenfield land development over considerations for the climate. It doesn't take account of legislation and recommendations from various UK bodies on carbon reduction.</p> <p>1 The plan does not protect Green Belt It should guarantee the protection of existing natural habitats.</p> <p>1 There is not a sufficient plan for infrastructure and employment growth to support the number of dwellings being proposed</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6024
<b>Person ID</b>	1264731
<b>Full Name</b>	Graham Smith
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The overall vision is one of continual growth, urbanisation, and concentration. I do not believe that this is the correct way for Dacorum to develop when it has such valuable assets as the Chiltern AONB within its boundaries.</p> <p>In addition, while there is national guidance for housing numbers within regions these are under review and for Dacorum will likely mean a reduction in necessary housing. The plan must be altered to reflect that by perhaps having options for different levels of need.</p> <p>In particular the vision of directing large scale growth at Tring is fundamentally wrong. A substantial proportion of the growth proposed is in Green belt areas that fundamentally affects the setting of the AONB, something that planning guidance does not support. This will materially alter the enjoyment of people visiting the AONB and other tourist/recreational areas around Tring, as the feelings of "ruralness" and "remoteness" will be lost forever.</p> <p>The growth around Tring goes against your statement in Conserving and Protecting the Environment "To conserve and enhance the landscape and scenic beauty of the Countryside and the Chilterns Area of Outstanding Natural Beauty."</p> <p>If such large-scale growth in the borough is needed, then use of existing brown field sites away from the AONB to create new communities and support the larger villages is preferable.</p> <p>No consideration has been given to the very large growth of Aylesbury/Aston Clinton and the way this affects Tring. Aylesbury is closer to Tring than Hemel Hempstead. This growth will also affect Dacorum in various ways A41 traffic Visitor traffic to outdoor leisure areas around and in the AONB and places such as the Tring Reservoirs and Grand Union canal.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6048
<b>Person ID</b>	1264820
<b>Full Name</b>	Mark Kilroy
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>While having to work to Government guidelines is an externally imposed constraint, much of the language is based on assumptions that what is planned is actually as wonderfully creative and good for local communities as it is claimed to be. The argument that expanding Berkhamsted and Tring and smaller communities is 'a good thing' is not reconcilable with the effect that is likely to be produced in the real world. That is to say that a quite predictable increased influx of people from other areas (not locals seeking affordable housing) will defeat the object of benefitting local people. What is the basis for arguing that local people will be the main beneficiaries? It sounds more like a pious hope.</p> <p>Also, what about parking provision in town centres, school places, medical and dental care and - especially - hospital capacity? What about the character of these communities, already strained by ribbon development towards hemel hempstead and towards Aston Clinton. Is larger going to preserve character? No it's not.</p> <p>On the question of employment and job creation, the plan needs to be revised at some point to take into account the effect of COVID-19 on working practices, in particular a propensity or necessity to work from home. Is there not already an argument to be made that people are and will increasingly choose where they live based on criteria which have less to do with proximity to their place of work and more to do with life style? The idea of fostering mixed economies with business parks, light industry and infrastructure to support a larger work-from-home population is a complex one and this plan does not show evidence of that kind of thinking. It reflects rather, build more, expand more and that's a good thing.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6066
<b>Person ID</b>	1264847
<b>Full Name</b>	Cheryl Newcomb
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No

<b>Comment</b>	<p>The number of homes needed is based on out of date and old data. The irreversible destruction of important green belt land should be a very important matter and consulted on using the very best available data to ensure the correct decisions are made.</p> <p>Reference is made to "affordable homes" but nowhere in the document is there a plan as to how this can be achieved. Homes within Dacorum are currently well above average and there needs to be a clear strategy as to how social housing and genuinely affordable homes can be delivered, and not just yet another development of homes that aren't affordable.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6070
<b>Person ID</b>	1264816
<b>Full Name</b>	Christopher Nicholls
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	In Tring the scale of development will destroy the character of the town. Looking at the proposal in other areas they also seem to be on to larger scale
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6081
<b>Person ID</b>	1264834
<b>Full Name</b>	Ilina Jha
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	The Government has said that the figure of 922 dwellings per year is a starting point, not a target, and that councils should know if things like Green Belt mean that the number cannot be reached. On 16/12/2020, the Government published a response to the recent white paper consultations; regarding the Green Belt, it states 'We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.' Therefore, it is clear that Green Belt should not be sacrificed for housing.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6096
<b>Person ID</b>	1264855
<b>Full Name</b>	Joanna LARKINSON
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6121
<b>Person ID</b>	1156066
<b>Full Name</b>	Bert Smith
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The Report shows a <b>Strategy</b> that is centred on six <b>Key Themes</b> – of which four are commented upon below:</p> <p><b><i>Theme1: Building Dacorum’s future with homes for everyone</i></b></p> <p>What does “<b><i>homes for everyone</i></b>” mean one wonders? Without proper caveats this Theme is meaningless. Dacorum’s future should not be about building more and more homes on its valuable and attractive green spaces.</p> <p><b><i>Theme 3: A happier, healthier and safer Dacorum</i></b></p> <p>Building hundreds of houses on the Dunsley and Cow Lane Farms will make very many residents and visitors less happy, less healthy and less safe.</p> <p><b><i>Theme 4: Creating a clean, green, attractive Dacorum</i></b></p> <p>Developing Tr01 will increase pollution, destroy a much-cherished green gateway to the historic market town of Tring and will irreparably damage the Town’s landscape and attractiveness.</p> <p><b><i>Theme 5: On-track for a better transport network</i></b></p> <p>Adoption of proposal Tr01 would inflict considerable harm to the local traffic network. Channelling high levels of additional traffic along Cow Lane, the London Road and the A2451 cannot in any way be construed as “<b><i>on-track for a better transport network</i></b>”.</p> <p>The farms are owned by Hertfordshire CC and it is understood that the farmers’ tenancy agreements are due to expire shortly - presumably HCC are assuming that the site is going to be approved for development. In view of the site’s current ownership, development may be viewed as being relatively straightforward for local government to deliver upon. Decisions regarding sites for development, however, must not be dictated by convenience. Sites have to be identified as being eminently suitable and the case for development of every potential location must be justified on proper planning principles, not based upon opportunism and expediency.</p>

It is difficult to understand why this site is continually earmarked for development when over the years countless residents of the Town have consistently and vehemently objected to it on the grounds that it is wholly unsuitable, completely lacking in merit and thoroughly ill-considered.

This area is, in very many ways, of particular importance to Tring and this is a clear reason why the Tr01 proposal should be removed from the Dacorum list of potential development sites.

The objectives of the Council are, on the whole, commendable. The reality in the form of the proposal to build upon the Dunsley and Cow Lane Farms is wholly irreconcilable in countless ways with such intentions.

**Included files**

[IMAGE 7.jpg](#)  
[IMAGE 10.jpg](#)  
[IMAGES 1-10.pdf](#)

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6132

**Person ID**

1264866

**Full Name**

Matthew LARKINSON

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6133

**Person ID**

1264824

**Full Name**

Anne Pattinson

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Tring will be intrinsically changed by a 50% growth. Small market town, to busy and overcrowded with a lot less countryside surrounding us.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6139
<b>Person ID</b>	1264872
<b>Full Name</b>	Ben Penaliggon
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The vision is contradictory. The amount of housing and development proposed is incompatible with aims within the vision for sustainability of biodiversity and protection of the green belt and adjoining AONB/ Special interest Beeches areas.</p> <p>We need additional housing, especially affordable ones, but the housing targets are based on incorrect projections from 2014 rather than 2018. Using the latter would halve the number of houses required. In addition, more creative use of brown field sites (and a full review of brown field opportunities is required). The pandemic has shown more people working from home and this may actually mean that more people want to live even further beyond the London commuter belt in which Dacorum currently sits. Therefore, the housing numbers need to be completely revisited.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6159

<b>Person ID</b>	1263462
<b>Full Name</b>	Bourne End
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Despite many positive features in the plan, many are aspirational only and fail to take into account the most recent technology (in respect of building for climate change conditions) or policies (Agriculture Act 2020 and Covid 19 regulations for open space).</p> <p>The most glaring problem is there is a mismatch between aspiration and regulation, such that the public expect more planning control than local councils can operate on their behalf.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6228
<b>Person ID</b>	1264884
<b>Full Name</b>	Max Ansell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The Local Plan runs counter to Themes 1, 3. 4 and 5.</p> <p>Building over large swathes of green belt land is not respecting our high quality countryside and would undermine the natural beauty of the area with a negative impact on the wildlife and preservation of the Chilterns Beechwood SAC</p>

The listed developments in Northchurch run counter to Dacorum Climate Change Strategy and would increase reliance on vehicles, carbon emission and, pollution. The steep hill sides are unsuitable to cycling as a means of transport and there are poor public transport links with the nearest railway station 40 minutes brisk walk away

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6232

**Person ID**

1263718

**Full Name**

Michael Vila

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

My comments relate to Berkhamsted. I have lived in Berkhamsted and Northchurch since 1975 and have seen a steady increase in traffic through and within the town, despite the provision of a bypass in 1993. There are just two uninterrupted two-way roads entering and leaving the town, the High Street and King's Road, and where these meet in the town centre the three-way lights with pedestrian phase are a frequent cause of congestion. All other exit routes are single-track or restricted by railway or canal bridges, and in many cases, the free flow of traffic is further constrained by parked vehicles.

At peak times the traffic situation is dire, with many motorists using rat-runs through residential areas in an attempt to avoid queues. I would suggest that traffic in the town is already nearing saturation point, and the idea of increasing the population as set out in the Dacorum Local Plan is likely to make the situation intolerable.

While an increased use of public transport might provide some relief, I suggest that in practice few people could be persuaded to use bus services. Berkhamsted is of course well-served by the railway, but most journeys made are to London and destinations further afield. People are deterred from using trains to travel to nearby towns on the route as their stations are a long way from town centres, eg Tring, Hemel Hempstead and Watford.

In all, I believe that the proposed scale of development will make the town an unpleasant place to live for many people, with congestion on the roads, intolerable demands on services beyond available resources, and the loss of so much irreplaceable green belt. Is that what we want?

**Included files**

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6237
<b>Person ID</b>	1264883
<b>Full Name</b>	Raymond Cox
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>In sufficient consideration has been given to the need for open spaces. Tring Park is the major open space in Tring and has suffered greatly in the current conditions with significant erosion of paths. The use of Tring Park has led to much fly parking and damage to verges particularly on Hastoe Land and Oddy Hill. In the wider context the use of Ashrige Estate is suffering more greatly from erosion and fly parking. This erosion and fly parking can only get worse with the large increase in the population of Tring</p> <p>The addition to the population of a small community can only be done slowly if one is hoping not to change the character of the community, but the plan is envisaging an increase of in the order of 50% in one go. The siting of an additional secondary school so close to the present secondary school is a recipe for disruption. I remember when I was at school there was a great deal of rivalry between secondary schools so close together.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6249
<b>Person ID</b>	1264898
<b>Full Name</b>	Bruce Ferguson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

<p>* <b>Yes</b></p> <p>* <b>No</b></p>	
<p><b>Comment</b></p>	<p>The Dacorum Local Plan (to 2038) does not sufficiently consider the government’s Ten Point Plan for a Green Industrial Revolution (Nov 2020), or the government’s Cycling and Walking Investment Strategy (April 2017) – and may consequently leave the council vulnerable to legal action.</p> <p>Specifically, the tokenistic references in the Plan regarding contributions to “off-site enhancements to the local road network” do not clearly delineate plans for traffic calming measures and segregated cycle lanes/footpaths, which would reduce air pollution and increase the viability of walking and cycling for short journeys in Berkhamsted.</p> <p>West Berkhamsted currently has an average of 1.48 motor vehicles per household, in 2,401 households. According to the plan, the proposed development in the West Berkhamsted area will create 1,860 households – which will lead to 2,753 additional motor vehicles on Berkhamsted roads, with next-to no commitment to sustainable local travel provision for the thousands of families in the town.</p> <p>Most of the additional motor vehicles will frequently use Shootersway and Kings Road for commuting and town centre access. The junction of these two roads has already seen a deterioration in air quality since the opening of Bearroc Park and the multistorey car park. The air quality at the junction of the high street and Kings Road has also degraded in the same period. Both junctions are a thoroughfare for school children as they make their way to local primary and secondary schools – currently with negligible infrastructure to support them.</p> <p>The current version of the plan does not adequately address four of its own objectives: ‘Mitigating and adapting to climate change’, ‘Conserving and protecting the natural environment’, ‘Promoting and facilitating sustainable transport and connectivity’ and ‘Supporting community health, wellbeing and cohesion’. If these points are not addressed, then the council may endure protracted legal proceedings.</p> <p>As a Berkhamsted resident and a strong advocate of sustainable transport for short journeys, I will not stand idly by as the ability of this and future generations to move safely around their home town is compromised.</p>
<p><b>Included files</b></p>	
<p><b>Consultation Point</b></p>	<p>Borough Vision to 2038</p>
<p><b>Comment ID</b></p>	<p>EGS6272</p>
<p><b>Person ID</b></p>	<p>1264914</p>
<p><b>Full Name</b></p>	<p>Malcolm HULL</p>
<p><b>Organisation</b></p>	
<p><b>Agent ID</b></p>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6306
<b>Person ID</b>	1264908
<b>Full Name</b>	Henry Smart
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6308
<b>Person ID</b>	1264916
<b>Full Name</b>	Kathryn Spall
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	The vision as set out is laudable - plenty of jobs, good education and health facilities, sustainable transport, environmental protection. However the only detailed focus of this plan seems to be where 16,596 homes are to be built. There is no explanation of where this number has come from, or why it should be accepted as the target number. It is an enormous increase on the figure set out in the 2013 Core Strategy and results in a proposal to build 5,954 houses on Green Belt land. The document recognises that the Green Belt should only be developed "in exceptional circumstances" but there is absolutely no explanation of what these exceptional circumstances are and why the Council believes this Borough should ride roughshod over the national planning guidelines. I believe that there is no justification for ploughing up the Green Belt and the plans as put forward are totally unsustainable.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6318
<b>Person ID</b>	1261257
<b>Full Name</b>	Simon Tuff
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<b>2.2 7.5</b>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6333
<b>Person ID</b>	1262933
<b>Full Name</b>	James Cunningham
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The vision in general terms are reasonable but I do not see the overall proposal will meet the vision or achieve the green objectives. The sentence "Dacorum will have taken full advantage of its strategic M1 - M25 - A41 location." says it all. The plans to grow Tring and Berkhamsted with lack of local employment is not green, will lead to more pressure on roads and infrastructure and is not a sustainable plan. The volume of home building along the A41 corridor from Hemel Hemsptead to Aylesbury is unsustainable and over dependent on road traffic with insufficient local employment.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6343
<b>Person ID</b>	1264906
<b>Full Name</b>	carol nutkins
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The pandemic means the plan needs to be more flexible and reviewed in all aspects including the number of homes we need but taking into account that working patterns have changed for many and working from home has become a sensible and workable option for many people and employers. Affordable homes need to be truly affordable for local young people who want to stay local to their families/support networks/employment and young families and those on low incomes. With the pandemic more people have lost jobs or have taken lower paid jobs. Housing needs should be reconsidered in the light of this and also take into account the change in working patterns and have appropriate space to enable and encourage working from home.  The plan, particularly around housing needs should be reconsidered due to changes brought about by the pandemic.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6346
<b>Person ID</b>	1264944
<b>Full Name</b>	Anna Sewerniak
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I am opposed to the Dacorum Local Plan.</p> <p>I am particularly opposed to the huge size and scope of the proposed development in Tring.</p> <p>Tring bears the brunt of this plan. When you translate the plan into what is being proposed it leads to a 55 per cent population growth for Tring.</p> <p>The population growth for Dacorum is nine per cent. Hemel Hempstead and Berkhamsted have plans for 20 per cent, other smaller towns that are more like Tring get 10 per cent growth. Why does Tring have to have that size of growth? I object to this unjust and unnecessary allocation of housing.</p> <p>The plan will involve an incursion into Green Belt land within the Chilterns Area of Outstanding Natural Beauty. It will annihilate farms. The habitats of our local wildlife will be destroyed, in turn destroying our wildlife. These will be lost resources for future generations for ever. Residents of Tring, including walkers, joggers and families will be deprived of these much loved amenities and their mental and physical well-being will suffer. There are no suitable local alternatives. I do not believe these are “exceptional circumstances” and do not support such an exaggerated and detrimental growth.</p> <p>Tring does not have the capacity for such growth in a relatively short time and infrastructure has not been considered. It will create what will amount to a whole new town around the outskirts of the current town, the inhabitants of which will expect to share many of the existing amenities of Tring.</p> <p>Traffic increase, due to these developments, will cause air pollution, congestion and do serious harm to Tring's inhabitants.</p> <p>During the Coronavirus pandemic, the efficient and successful use of technology has facilitated significant changes in our way of working. It has been widely reported that increased home working has led to the freeing up and reduction in</p>

use of office space. Looking forward, this is likely to become an increasing work mode choice for many due to the advantages for businesses, employers, employees and also the protection of the environment.

A lot of developments have recently been and are being carried out in and around Tring. The primary purpose of these developments is to serve developers, shareholders and wealthy Londoners and the house prices will reflect this. A more cost effective and environmentally friendly proposal would be to repurpose empty London offices to provide affordable housing.

In Tring, due to the pandemic and to the increasing use of online commerce, there are now several unoccupied retail premises. These could also be reassigned for provision of affordable housing.

In the current situation, rather than pushing ahead with this development plan, it would be prudent to wait until the country has recovered from the pandemic when development proposals can be reassessed in light of changed circumstances, reformed working practices and the changing needs of people. This would also enable a review of alternative options, particularly as the current development plan is on such a large scale.

The government has promised to 'level up' the economy, living standards and life chances across the country. The government has announced a review of the rules for deciding which public investments go ahead, with the intention of increasing the share going to areas outside of London and the southeast of England. There is also the Northern Powerhouse, the proposal launched to boost growth in the north of England.

There is a countrywide necessity to invest in the North to get the North of the country out of poverty and deliver on the Government's levelling up promise.

The Dacorum Local Plan needs to be put on hold. In addition it will then need to be reviewed in order to bring it in line with updated facts and changed national circumstances. It will need to be brought into the more realistic and fairer realms of actual, not perceived or wished-for regional needs.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6347

**Person ID**

1264941

**Full Name**

Paul Simpson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

<b>* No</b>	
<b>Comment</b>	The plan for Tring is flawed and should be based on infill sites in Tring itself and not a strip development along Station Road between Tring Town centre and Tring Station . Loss of green belt , an area of outstanding beauty and need for affordable housing in the town centre not on green field sites. Also it would ruin the charm and history of Tring itself with development that would attract only commuters and not local jobs and the town itself .
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6354
<b>Person ID</b>	1264936
<b>Full Name</b>	Jane Cracknell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> <b>* Yes</b> <b>* No</b>	No
<b>Comment</b>	Berkhamsted has already grown a lot over the last few years. It cannot support the level of development now being suggested. Employment, services and transport are already at their limit.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6368
<b>Person ID</b>	1264938
<b>Full Name</b>	David Bloomfield
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The need for additional housing is higher than it needs to be - over double the amount in the previous plan is simply too much for Dacorum to cope with, especially in terms of having no local hospital, impact on schools and already over used transport infrastructure.</p> <p>In addition, despite all the promises, I do not believe that the local authority will provide anywhere near the number of realistically affordable houses required to get young local people onto the housing ladder and also to reduce the very substantial local authority housing list.</p> <p>The vision states that a full range of community facilities will have been made available - this is hard to believe, given that a Tory Council demolished the Pavilion 19 years ago and has not seen fit to replace it since.</p> <p>The vision states the desire to make Dacorum 'a great tourism destination' but this local authority has resisted all proposals to even create a local museum in the borough.</p> <p>There should be no development on green belt land if at all possible and if it has to happen, needs to be fully justified and be able to fit into the location.</p> <p>Any assistance to developing or improving Hemel Town Centre should ensure this includes the Old Town area, which should be promoted as a niche retail area.</p> <p>The number of house proposed for Hemel is simply too high, especially given these are restricted to only a few areas - see above comments about the lack of a hospital etc.</p> <p>A proposal for 2,400 house approved as 'windfall' developments is ridiculously high.</p> <p>Approximately 35% of the proposed housing is anticipated to come from 'greenfield' sites - this is a poor vision to have, given peoples needs for such sites in their existing state.</p> <p>What are the 200 homes included as part of the Grovehill Neighbourhood Plan? To my knowledge, the plan does not actually propose any new housing.</p> <p>Why is there a need for the plan to actualy propose 300 more houses than is required?</p> <p>There is no need whatsoever for a new supermarket on the Market Square site in Hemel - this is where a new theatre should be developed. Nor is there a need for another supermarket at Jarman Park - that is simply ludicrous.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6375
<b>Person ID</b>	1264949
<b>Full Name</b>	Evelyne Brocas

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>I feel all this building over big stretches of our Green Belt does not fit in with Dacorum's aim to respect our high quality countryside and would be detrimental on the natural beauty of the area. it would be terrible for the wildlife and certainly not help in the preservation of the Chilterns Beechwood SAC</p> <p>it all goes against the Dacorum Climate Change Strategy - here in Northchurch all these new people would have to rely on cars and that would mean a bigger carbon footprint and even more pollution - the opposite of the council's strategic aims. We are a long way from Berkhamsted train station and older residents like me have to rely on a bus into town.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6393
<b>Person ID</b>	1227391
<b>Full Name</b>	mrs caroline shaughnessy
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>I appreciate that you as a borough are dictated to by central government around growth etc and as a Borough surely it is better to communicate this vision and seek support and understanding from the actual residents and families that will grow. However, I really believe that this consultation process has been shielded and one could be cynical as to the reason why. To get better support and feedback to this or any other plan you need to engage and make the process much more transparent and accessible.</p> <p>For example,</p>

- 1 as much as I have tried to encourage people to partake in this consultation via social media, I bet you do not have very many responses. Most people didn't know what I was talking about.
- 2 I saw only reminders from two local councillors, I have never seen any communication and public involvement from any of the others which frankly is abysmal considering they are being paid.
- 3 The process to log on and register is quite difficult for some people.
- 4 I have just read the whole document and information prior to comment and to be honest ...I found it hard work most people would give up at the trying to register point.

Am I cynical to think that actually you do not want any responses, good or bad ?

There could be more interactivity on social media asking for responses , local councillors should be made to submit quarterly reports that they have canvasses their local residents to gain feedback good or bad.

Borough has to understand that most people do not operate at the business level as those who compile the strategies and reports, you cannot expect them to comment on things that they cannot fully understand

I have really struggled to read and understand this, but I know what I want to say to make Hemel Hempstead a wonderful visionary place to live without turning it into a concrete, traffic polluted, neglected town, where building homes and collecting rates is just about profit and nothing else.

I am not alone, there are so many people in Hemel who think it is a great place to live and will also support that continuing, but it has to be balanced for the existing residents and some of the proposals do not take into account it will make existing problems worse.. Mainly around new developments around existing homes and not providing adequate parking to an already problematic ongoing issue.

Please invest into a communications strategy that utilises platforms that most residents would actually use and get the councillors to ensure that their ward residents have regular communication and encourage community adhesion.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6394
<b>Person ID</b>	1264964
<b>Full Name</b>	Philip Heaphy
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

<b>* No</b>	
<b>Comment</b>	<p><i>The target of c. 17,000 new homes over the Local Plan period is excessive when compared with Dacorum BC's previous estimates of what is required as well as with ONS estimates. Furthermore the target and the distribution of where housing sites will be available has been overtaken by the effects of the Covid-19 pandemic in terms of changes to commuting, shopping and other living patterns, as well as office and retail sites which might become available for housing within urban areas. This will enable a more intensive use of brownfield sites for housing to the benefit of the Green Belt and the Rural Area.</i></p> <p><i>The use of some 850 hectares of Green Belt is inappropriate having regard to the proximity of areas allocated for housing to the Chilterns AONB.</i></p> <p><i>Dacorum BC should make use of exceptions to the target housing figures if meeting the target adversely impacts the Green Belt and the Chilterns AONB.</i></p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6438
<b>Person ID</b>	1264951
<b>Full Name</b>	Chris Perks
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> <b>* Yes</b> <b>* No</b>	No
<b>Comment</b>	<p>Whilst there may be a need for more housing, in particular for more genuinely affordable housing, I have serious concerns regarding the scale of proposed development. The Council may have failed to take account of National Planning Policy Framework (NPPF) which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB. In terms of proposed housing numbers, it's 9,995 on land currently in the Green Belt, plus 1,665 on four ex-Green Belt sites. Green Belt is what makes Dacorum Dacorum, and it is being given away cheaply in my opinion, which will destroy the livability of the borough.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6442
<b>Person ID</b>	1264971
<b>Full Name</b>	Louise Watson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p> <p>Anything to uses greenbelt land instead of brownfield or previously built on areas will spoil what makes Dacorum wonderful to live in.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6446
<b>Person ID</b>	1264982
<b>Full Name</b>	Rachel Heaphy
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	<p><i>The target of c. 17,000 new homes over the Local Plan period is excessive when compared with Dacorum BC's previous estimates of what is required as well as with ONS estimates. Furthermore the target and the distribution of where housing sites will be available has been overtaken by the effects of the Covid-19 pandemic in terms of changes to commuting, shopping and other living patterns, as well as office and retail sites which might become available for housing within urban areas. This will enable a more intensive use of brownfield sites for housing to the benefit of the Green Belt and the Rural Area.</i></p> <p><i>The use of some 850 hectares of Green Belt is inappropriate having regard to the proximity of areas allocated for housing to the Chilterns AONB.</i></p> <p><i>Dacorum BC should make use of exceptions to the target housing figures if meeting the target adversely impacts the Green Belt and the Chilterns AONB.</i></p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6454
<b>Person ID</b>	1264970
<b>Full Name</b>	Frankie Mitchell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I feel the scale of the developments like this in the East of England add to overcrowding, put pressure on infrastructure and contribute to eroding the quality of life of existing residents. I believe the Government should adopt a more considered nationwide housing and industry development strategy by creating new towns in the North.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6459
<b>Person ID</b>	1264977
<b>Full Name</b>	E Ling

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I object to the Dacorum Local Plan.</p> <p>I particularly object to the huge size and scope of the proposed development in Tring.</p> <p>Tring bears the brunt of this plan. When you translate the plan into what is being proposed it leads to a 55 per cent population growth for Tring.</p> <p>The population growth for Dacorum is nine per cent. Hemel Hempstead and Berkhamsted have plans for 20 per cent, other smaller towns that are more like Tring get 10 per cent growth. Why does Tring have to have that size of growth? I object to this unjust and unnecessary allocation of housing.</p> <p>The plan will involve an incursion into Green Belt land within the Chilterns Area of Outstanding Natural Beauty. It will annihilate farms. The habitats of our local wildlife will be destroyed, in turn destroying our wildlife. These will be lost resources for future generations for ever. Residents of Tring, including walkers, joggers and families will be deprived of these much loved amenities and their mental and physical well-being will suffer. There are no suitable local alternatives. I do not believe these are “exceptional circumstances” and do not support such an exaggerated and detrimental growth.</p> <p>Tring does not have the capacity for such growth in a relatively short time and infrastructure has not been considered. It will create what will amount to a whole new town around the outskirts of the current town, the inhabitants of which will expect to share many of the existing amenities of Tring.</p> <p>Traffic increase, due to these developments, will cause air pollution, congestion and do serious harm to Tring's inhabitants.</p> <p>During the Coronavirus pandemic, the efficient and successful use of technology has facilitated significant changes in our way of working. It has been widely reported that increased home working has led to the freeing up and reduction in use of office space. Looking forward, this is likely to become an increasing work mode choice for many due to the advantages for businesses, employers, employees and also the protection of the environment.</p> <p>A lot of developments have recently been and are being carried out in and around Tring. The primary purpose of these developments is to serve developers, shareholders and wealthy Londoners and the house prices will reflect this. A more cost effective and environmentally friendly proposal would be to repurpose empty London offices to provide affordable housing.</p> <p>In Tring, due to the pandemic and to the increasing use of online commerce, there are now several unoccupied retail premises. These could also be reassigned for provision of affordable housing.</p>

In the current situation, rather than pushing ahead with this development plan, it would be prudent to wait until the country has recovered from the pandemic when development proposals can be reassessed in light of changed circumstances, reformed working practices and the changing needs of people. This would also enable a review of alternative options, particularly as the current development plan is on such a large scale.

The government has promised to 'level up' the economy, living standards and life chances across the country. The government has announced a review of the rules for deciding which public investments go ahead, with the intention of increasing the share going to areas outside of London and the southeast of England. There is also the Northern Powerhouse, the proposal launched to boost growth in the north of England.

There is a countrywide necessity to invest in the North to get the North of the country out of poverty and deliver on the Government's levelling up promise.

The Dacorum Local Plan needs to be put on hold. In addition it will then need to be reviewed in order to bring it in line with updated facts and changed national circumstances. It will need to be brought into the more realistic and fairer realms of actual, not perceived or wished-for regional needs.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6469
<b>Person ID</b>	1264923
<b>Full Name</b>	Ken Douglas
<b>Organisation</b>	Secretary TRING IN TRANSITION
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	As a resident of Tring: The sentiments expressed for Dacorum are sound - if not necessarily followed through <i>explicitly</i> in the Plan - however it is disappointing that DBC appear unable or unwilling to use their legitimate power and available evidence to push back on the proposed dwelling numbers. Give the considerable constraints of Green Belt (much more so than of our neighbours) and the location of large parts of the Borough that will flank a proposed National Park it is surprising that Green Belt land has been given up without

any real apparent push-back. The increase in housing numbers are not realistic. Attempting to accommodate them will significantly damage the well-being of the existing residents and have an enormously negative and irreversible impact on our surrounding countryside.

It is also a surprise that there is NO mention of Buckinghamshire in the Plan (ref Section 1.3 "Working with Others"). This is especially a worry for Tring (bounded by Bucks on both sides) which has an economy much influenced by the villages (in particular to the North). Nearby developments in Bucks and are closer to Tring than even Berkhamstead and yet there is no evidence this has been taken into account - this has resulted in flawed assumptions about industrial growth, infrastructure and even schooling.

### **Comments on Overarching Vision**

Environmental Sustainability is the first major heading – rightly so for the 21st century. This theme is expanded upon elsewhere throughout the plan (starting at section 2.2) however, I feel an opportunity is being missed to take a more robust stand, for example by referencing DBC's Climate Emergency Declaration and zero carbon target of 2030. Other authorities, for example, have already mandated inclusion of solar energy capture in new builds, community renewable energy schemes, tough building standards and more. Given that we are planning for a mid-21st-century environment I believe Dacorum should also take a more robust and explicit approach.

My greatest concern lies with the statement (in the overarching vision section) that states:

- "have delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape and protected environmental sites"

The site proposals for Tr03 are among the least well thought out proposals in the entire plan. The controversial "Bulbourne Crossing" is better worked through by an order of magnitude. There are flaws in the presented evidence about infrastructure and traffic (which incorrectly states only Brooke Street to be a traffic Hot Spot...and fails to mention the weekend bottlenecks at Station Rd/London Rd and Cow lane/London Rd), in the proposals about the required "Link Road" (which can only become a east of Tring Bypass), and numerous other issues (such as the Sustainability report noting there is no flood risk....which is entirely counter to local knowledge, actual photographic evidence, the existence of a nationally strategic pipeline (which is not even mentioned) and more....it all feels like a develop statement and NOT what residents would expect and hope for from an impartial and professional planning entity.

In the comments below we give considerable evidence to indicate that the proposals for Tring are *not compliant with the Plan's own stated strategic objectives* – even if dwelling growth numbers are significantly reduced.

We acknowledge that (as per section 1.12, Page 6) we are not reviewing a final Plan, nonetheless there are many points that must be addressed in those sections that are more advanced in their evolution:

- This section notes the importance of cross-boundary matters. For Tring, bounded on *two* sides by Buckinghamshire, the plans of that county have a significant bearing on employment, traffic, local land use etc. In the Plan, we can find no reference to Aylesbury Vale District Council or Buckinghamshire, and few to local villages in that county, contrary to NPPF para This is a concern and may have led to what we feel are flawed conclusions on matters ranging from employment to the siting of additional retail (see detailed response to later questions).

- It should be explicit here (and reflected in all other relevant sections) how the Plan will meet new Environmental Sustainability challenges formalised during the latter part of 2020, including the revised Sustainable Hertfordshire Strategy (and associated targets) and the priorities defined by the Hertfordshire Climate Change and Sustainability Partnership (HCCSP). These go far beyond references to this topic on page 22
- *‘A central thread of the Local Plan is to plan for a low-carbon future in which carbon emissions and other greenhouse gases are reduced.’* This is a welcome statement; however, we feel an opportunity is being missed to take a more robust stand, for example by referencing DBC’s Climate Emergency Declaration and zero carbon target of 2030. Other authorities, for example, have already mandated inclusion of solar energy capture (thermal or PV) in new builds, community renewable energy schemes, tough building standards and Given that we are planning for a mid-21st-century environment we believe Dacorum should also take a more robust and mandated approach.
- *‘We do not believe [there will be] a significant requirement for new [Retail] floorspace over the lifetime of the Plan.’* We broadly agree with this, especially given the higher percentage of empty retail space in Tring High Street compared to (at least ) Berkhamstead – however, Tring has long retained a market feel and there are opportunities to make changes to support a much larger, vibrant, ‘destination’ market space (see also our comments on Delivery Strategy)
- We strongly support this intention – and would like to see more instances of this aspect of the strategy made explicit elsewhere in the plan
- There are over 20 references to the importance of local distinctiveness in the Plan, e.g., page 22: *‘All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.’* We strongly support this position but are concerned that there are no references to what makes Tring distinctive, or to a process by which that will be agreed and at what stage it will become binding on this Local Plan

We strongly feel that this needs to be formally addressed. Placed at an important ancient crossroads, Tring’s market heritage is deeply rooted, it has a track record of many ‘firsts’ including clean water supply, land set aside for public amenity and nature conservation and water and wind-based energy generation and is also located in the midst of more SSSIs and officially designated natural beauty than other locations in Dacorum.

See our more detailed comments on this point in our response to Question 9: ‘Do you have other comments on the plan?’.

- At such a high level it is difficult to comment. It would be good to see a version of this with five or six explicit and detailed bullet points on the key means to achieve this, reflecting local For example:
  - How will the viability of Tring as a market town be maintained with such an increased population and associated pressure on a town centre that will have to accommodate more traffic?
  - How can sensitive views and landscape be maintained? (See later comments – Q9 – on this).
  - There is not yet a joined-up cycle and footpath plan for Tring and there are gaps where this extends beyond residential or connecting streets

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6474
<b>Person ID</b>	1264974
<b>Full Name</b>	Catharine Shaw
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The plan for housing development at the scale proposed (in Hemel Hempstead in particular) is inappropriate and risks achievement of Dacorum and UK policy and law on tackling the climate emergency.</p> <ul style="list-style-type: none"> <li>- plans for low/zero/negative emission transportation and infrastructure should be in place (with other relevant parts of government) before commitments are made to such extensive development</li> <li>- Net zero emissions should be required immediately not only from 2030 as this encourages early, suboptimal development that will risk to contribute to missing 2050 targets. This is a serious concern.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6522
<b>Person ID</b>	1264920
<b>Full Name</b>	Anna Wellings Purvis
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

<b>* No</b>	
<b>Comment</b>	Dacorum needs services and infrastructure, our hospital services are shrinking while our population ages and increases, and this plan does not deliver solutions. This plan does not include the road widening, overpasses and public transport that would prevent higher air pollution. As a public transport user, we need direct buses from Adeyfield to the train station and preferably a nearby line of rail, what we do not need is traffic jams which as well as being frustrating cause poisonous levels of air for small children, dogs and drivers. Trees in the Chilterns will not save us from cancer over in Adeyfield and Bennetts End and Leverstock Green.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6542
<b>Person ID</b>	1264959
<b>Full Name</b>	Neil Fraser
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
<b>* Yes</b>	
<b>* No</b>	
<b>Comment</b>	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 there are other new homes in Dacorum on infills are even more expensive). Wages are stagnant 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. It is affordable homes that are needed for people that have been unable to save due to high rents. I'm not sure where your evidence is that sufficient numbers of people will want to and be able to afford to live on the new estates in the full market value homes; including those above Grovehill and Woodhall Farm. I hope that homes do not get built

on the greenbelt and only if there is a genuine need after brownfield sites have been built on first. The greenbelt was there for a reason. I suggest you see how quickly the homes get sold at Marchmont Fields, before this plan is finalised and the go ahead to build on any more greenfield sites is given. This will test whether there is a sufficient market in the area for new homes.

If the plan is as successful as you expect I don't believe that the hospital and the roads will be able to cope. Hemel already gets congested and I'm not convinced that the planned measures to reduce this will be sufficient. We have already lost our A&E. How can you be planning to increase the local population by the amount you are; without Dacorum having an easily accessible A&E.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6550

**Person ID**

1265007

**Full Name**

Duncan Brown

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected.

The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6554
<b>Person ID</b>	1265011
<b>Full Name</b>	Rebecca Staples
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6600
<b>Person ID</b>	1265006
<b>Full Name</b>	Tracy Bownes
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>In principle, I agree with the objectives outlines in 3.3.</p> <p>However, the plan in current form focusses on the areas for additional housing with little substantiation of and of the themes. There is ano annalysis of the employment to be created (theme 2), there is nothing other than principle on transport (theme 5) and without adequate detailed planning of solutions for education provision, healthcare provision,</p>

rail transport improvement, sports facility provision, I cannot see how the plan can deliver "a happier, healthier and safer Dacorum (Theme 3). The reclassification of existing Green belt land into "greenfield growth areas" is detrimental to some existing residents enjoyment of Dacorum, and a threat to the environmental habitats we are currently able to enjoy. The current proposed increase in dwellings imposed on Dacorum exceeds that which can be done without destroying existing greenbelt land. The proposed 16,600 homes is a c.25% increase in existing dwellings, and in excess of the 2013 plan. I do not believe there are "exceptional circumstances" as defined by the NPPF for this destruction of existing greenbelt.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6618

**Person ID**

1263500

**Full Name**

Jessica Haigh

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I am not quite sure you will still be able to call Tring a 'Market Town' when it will be experiencing 55% growth. I also wonder why no extra doctors, dentists, or healthcare settings are being included in the plan.

The current surgery in Tring (Rothschild's surgery) is overwhelmed with very long waiting times for appointments. It is often a struggle to see a doctor, even for emergency appointments. How do you expect this surgery to cope with the demand of 55% more households moving to this area? Also, the roads are already extremely busy, with standstill traffic. The main car park in the centre is full most days and many houses do not have driveways or areas they can park their vehicles. How will the roads cope with the added demand? I do not think all of these issues have fully been thought through. By adding housing, you need to be adding doctors, dentists, opticians, pharmacies, car parks and more. A lot of this isn't even mentioned in the plan.

Also, you claim to be protecting the countryside, yet a lot of the housing developments will be on green belt land and natural wildlife sites? If you want to protect the climate, these developments need to be stopped. Surely they can be moved to brownfield sites? Or develop office buildings and shops which may not be in use after the pandemic.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6629
<b>Person ID</b>	1265019
<b>Full Name</b>	Yvonne Brener
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I endorse the response of the chiltern countryside group</p> <p>The plan builds on green belt land. There is no clear plan about how the loss of this land will be mitigated or how biodiversity will be upheld. there is no plans for making the borough greener. for better public transport links. the infrastructure will not cope. There is no mention of this. the schools are already oversubscribed in Berkhamsted. When you link up the entire plan the nature of two beautiful market towns are changed forever and almost become one mass conurbation. The houses built should reflect need and should be affordable, the numbers of houses needed in the area does not justify decimating green belt land,</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6644
<b>Person ID</b>	1265020
<b>Full Name</b>	Tony Turner
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6650
<b>Person ID</b>	1264867
<b>Full Name</b>	Corinne Fleming
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6651
<b>Person ID</b>	494770
<b>Full Name</b>	Mr John Borton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

<b>* No</b>	
<b>Comment</b>	A 24% increase in housing and a 30+% increase in the urban footprint of Berkhamsted is not compatible with retaining Berkhamsted 'historic, market town' identity
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6657
<b>Person ID</b>	1261827
<b>Full Name</b>	Ian Brener
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> <b>* Yes</b> <b>* No</b>	No
<b>Comment</b>	<p>This is an awful way of getting a response from ordinary citizens. The document is over long and unreadable. It is ridiculous and irresponsible that this is happening during such an unprecedented crisis for our country. I can't believe that this is legitimate.</p> <p>The developments are totally out of proportion to the towns of Berkhamsted and Tring. They are using Green Belt land where there is brownfield sites possible. How can I endorse a plan that will ruin these small towns and totally change their character. You say that you are mindful of AONB but you only have to see the devastation of increased wiking traffic through Ashridge the difficulty that this has caused for farmers in the area</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6666
<b>Person ID</b>	1265029
<b>Full Name</b>	Christian Armond
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I live in Berkhamsted and the vision laid out gives no details of any additional sporting facilities to meet the needs of the additional housing development that has been laid out. There is already a significant shortage of sports pitches, and specifically youth football pitches, and this will be exacerbated by the new proposed developments.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6669
<b>Person ID</b>	1264937
<b>Full Name</b>	Danny Killeen
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The Vision will not conserve and protect the natural environment when 2000 acres of green belt and open spaces will be lost. With over 1m people estimated to have left the UK in the past 12 months (half a million from Europe), the change in working practices, high street sustainability challenges, the councils strategy needs to adapt. Not that it appeared wrong in 2019, but it is outdated in 2021 - even though aspects were reviewed in 2020 due to covid.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6676
<b>Person ID</b>	1265026
<b>Full Name</b>	Sarah hughes

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Whilst the vision appears to be there in the writing health and wellbeing will be so detrimentally effected by buiding on greenbelt land that this cannot be compensated by adding extra leisure facilities. Greenbelt was put in place for everyones well being as was to be protected from development at all costs but a very larhe proprtion of this growth is on greenbelt land which is totally unacceptable</p> <p>The plan does include the building of cycle paths and lanes which is very good news but Dacorum lags behind the rest of Hertfordshires major towns so vastly that these new routes will not even takes up the the current level of places such as Stevenage and Welwyn and most of the cycle paths are not going to link up the different areas so travelling around the borough safely by bike will still be extremely difficuly and will therefore not encourage the use of bikes.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6684
<b>Person ID</b>	1265033
<b>Full Name</b>	James Heath
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Impacts on Tring will not be sustainable.</p> <p>The developments especially those to the East of town will not protect environmental sites, the loss of countryside into a building site is not sustainable the loss of the many hedgerows and impact on the canal will affect the local wildlife.</p>

The town of Tring cannot cope with the new housing demands. The road network is already under pressure it will be made considerably worse by allowing further development. The roads in and around the town are already in poor condition, e.g. Station road, all the additional construction vehicles will make this even worse. The high street keeps being dug up, already three times this year! This diverts traffic up and around Silk Mill Way a residential area, with extreme developments this will only get worse.

Although the plans propose new school places, these are not assured. The recent development to the west of town was supposed to add new services - none seems to be forthcoming, what happens to a new primary school? There are currently not enough school places in Tring, my children could not get a place in Tring and have to travel daily to the surrounding villages, new developments will only make this worse!

Before any new houses are built the infrastructure must be put in place first.

The only secondary school in Tring is already vast, I have taught in schools for 20 years from my experience this already massive school, over 1700 students will only get bigger with new developments thus

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6699

**Person ID**

1263462

**Full Name**

Bourne End

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Despite many positive features in the plan, many are aspirational only and fail to take into account the most recent technology (in respect of building for climate change conditions) or policies (Agriculture Act 2020 and Covid 19 regulations for open space).

The most glaring problem is there is a mismatch between aspiration and regulation, such that the public expect more planning control than local councils can operate on their behalf.

**Included files**

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6705
<b>Person ID</b>	1264940
<b>Full Name</b>	Fiona Naylor
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	It is not possible to hold a proper consultation with the residents in this borough about this huge topic online, with no meetings held in our towns to discuss them. The volume of information on this site is admirable, but takes hours to read and process - and to be honest, I need to be able to see it being discussed properly in public by those who know more about it to really decide what I think about it. We must therefore pause the deadline for this review, until such time as we can get together and hear it being debated properly. It won't be long now, only a couple of months, so it is worth waiting to ensure that the folks living in our towns get a fair say on what happens to them.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6712
<b>Person ID</b>	1265036
<b>Full Name</b>	Tom Burrows
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Not proportionate for Tring. Destroys too much Green belt and would destroy the town.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6720
<b>Person ID</b>	1265062
<b>Full Name</b>	Kev Nash
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The. Idiom will over populate the area and remove the natural beauty of the area
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6748
<b>Person ID</b>	1265050
<b>Full Name</b>	Denise Feasey
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	Needs statement on diversity e.g. 'stronger, vibrant and diverse communities' Throughout the document there is little reference to disability. With advancement in medicine the population of disabled youngsters is growing. They are often marginalised and don't have the same access to community facilities, parks, local woodlands that their peers do. They

don't have access to specialist play facilities that will keep them safe and as a result they and their families can feel isolated from their own community. They and their families need to be represented.

Need more focus on managing existing small woodland areas - e.g. The Common Kings Langley – this can be achieved through providing expertise and engaging local volunteers. Protecting and enhancing the environment and building communities in line with the whole vision. Link up with organisations such as the Wildlife Trust.

Important to keep the character of key villages while balancing the needs for affordable housing to allow younger residents buy their first homes. Importance of protecting conservation areas historic villages such as Kings Langley.

Importance of incorporating wildlife areas into new housing developments, space housing, use of trees, meadow areas etc. soften the building works.

Town centres - develop community hubs, outdoor theatres, markets, local business, seating and accessible play areas. A range of festivals and celebrations -christmas markets, small scale pop up beer festivals, harvest festival celebrate local produce.

Essential to manage parking and volumn of traffic, has been overlooked in the past and caused significnat problems, also impacting on the character of the area. Impact of traffic on main roads such as Hempsted Road from accumulation of traffic due to building across Dacorum.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6757

**Person ID**

1265054

**Full Name**

Adrian Truman-Williams

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Plan presents overwhelming threat to the green belt.

Housing targets are too large and their untanible to carry out safely.

What happened to climate change, inadequate provision using renewable energy.  
Local infrastructure nowhere near adequate.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6760

**Person ID**

1265059

**Full Name**

Paul Austin

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The overarching vision focuses on growth in a time of global pandemic and an environmental crisis. Growth is defined by increased housing and population as a response to government policy, (which has since been questioned), rather than quality of life. Hemel suffers incredible inequality with a dying high street, with berkhamsted and Tring both market towns within the green belt where additional housing will destroy both the green belt, but also place undue pressure on existing infrastructure. Hemel should be the focus to address inequality within the population.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6765

**Person ID**

1265079

**Full Name**

Darly Rattigna

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	the assessment is developer friendly. no effort to say what are the exceptional circumstances to justify green field development in the berkhamsted area
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6766
<b>Person ID</b>	1265058
<b>Full Name</b>	Rick Ansell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	The plans do seem to match the vision. This vision is laudable but the plans will change Berkhamsted into a faceless satellite of London and it will lose its current character of a traditional market town that the Vision purports to enhance. Additionally the new developments will destroy the views that the Vision intends to maintain. For example the fine views across the Vally from berkhamsted Common will be lost as the fields and patches of woods will become a housing estate
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6767
<b>Person ID</b>	1264946
<b>Full Name</b>	Shaun Pope
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6772
<b>Person ID</b>	1265081
<b>Full Name</b>	Caitlin Neale
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6777
<b>Person ID</b>	1265063
<b>Full Name</b>	Richard Scott
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The Council's Vision's high-level statements and intent have all the components that you would expect, but is completely inconsistent to the draft plan which follows it. The building on Green-Belt land, the number of dwellings you are looking to build and the under-pinning data that the Council is using to calculate the number of dwellings needs to be challenged. Given the Council represents the people of Dacorum - it is clear the Core Strategy previously outlined is more appropriate.</p> <p>The vision refers to plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that the draft Plan has way too many new homes will be built, many of which will be on the green-belt - something which the council and its members have consistently said it will not do. The Council has decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922 dwellings per annum, without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan.</p> <p>They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6781
<b>Person ID</b>	1265072
<b>Full Name</b>	Peter Barker
<b>Organisation</b>	Me
<b>Agent ID</b>	1264829
<b>Agent Full Name</b>	Peter Barker
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b>	No

<b>* No</b>	
<b>Comment</b>	The Draft Local Plan as stands would increase the urban footprint by 31% and the number of daily car movements by 15,400. 77% of this would be on Green Belt or green fields land. This will destroy 850 hectares of precious green belt. On top of this there is not sufficient plans to support this growth in terms of infrastructure.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6811
<b>Person ID</b>	1265056
<b>Full Name</b>	John Hitchcox
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> <b>* Yes</b> <b>* No</b>	No
<b>Comment</b>	<p>Specifically with regards the Berkhamsted development.</p> <p>The previous plan stated that Berkhamsted was not suitable for further development, yet this latest plan suggests adding 2000 houses. It's very clear that the current plans would add to already congested roads, increase pollution levels, put pressure on water supplies and wastewater systems and vastly increase surface run-off in an area already prone to flooding.</p> <p>The infrastructure needed is also not in place – where will all of these extra children go to secondary school? There is just one state secondary school in Berkhamsted, which is already at capacity. There is no provision for this in the plan.</p> <p>There also seems to be no consideration of how important green space is to existing residents and biodiversity in the area. Building on green areas removes the very reason people have chosen to live here.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6872
<b>Person ID</b>	1265090
<b>Full Name</b>	Amal Hirani

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	The plan mentions new and improved cycle links from Tring town centre to the centre. There is already a dedicated (and recently resurfaced) cycle lane footpath. What more will be done? As a daily user of that path, i don't think more needs to be done and putting that in there is advertising something that is not needed.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6877
<b>Person ID</b>	1265074
<b>Full Name</b>	Stephen Wilson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	There will not be anywhere near sufficient social housing to support those people on Dacorum's housing list. The so-called affordable housing is nowhere near affordable for low income families.  I wished I could believe that the Natural Environment would be preserved and protected but having read through all the relevant documents, I can see no policies that would guarantee this and it is my belief that the size of the planned urban expansion would in fact do considerable harm to the Natural Environment.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS6884
<b>Person ID</b>	1265039
<b>Full Name</b>	Michael Lelieveld
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I feel the scale of the development proposed in Berkhamsted is counter to Themes 3, 4 and 5:</p> <ul style="list-style-type: none"> <li>• Theme 3: <i>A happier, healthier and safer Dacorum.</i></li> <li>• Theme 4: <i>Creating a clean, green and attractive Dacorum.</i></li> <li>• Theme 5: <i>On-track for a better transport network.</i></li> </ul> <p>The local strategic plan intends for a 25% increase in housing for Northchurch and Berkhamsted, with the majority to be built on existing Green Belt. This scale of development will change the character of Berkhamsted forever, transforming it from historic market town to feel like any other large bustling over-populated urban area in the South East. This cannot possibly create a happier environment and cannot make Berkhamsted cleaner and greener either (in fact the opposite). Nor will it make it safer. Already people are driving in large numbers down Shootesway to bypass the High Street, often travelling at well in excess of the 30mph limit. Adding over 800 homes along Shootersway and KingsHill Way will only add to this danger. Which leads to Theme 5. Berkhamsted streets are already at/beyond capacity for both congestion levels and parking. They cannot take any more traffic. Furthermore, the High Street already has unsafe pollution levels on light wind days (exacerbated because Berkhamsted is in a valley) and this also can only get worse with 25% increase in housing.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6907
<b>Person ID</b>	1265103
<b>Full Name</b>	Fran Fleming

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Too many houses suggested for the need and no evidence they will be affordable for the people that need it.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6910
<b>Person ID</b>	1265105
<b>Full Name</b>	Jonathan Tay
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I think the plans involve the creation of too many housing units without enough infrastructure. For example, in Tring, a large number of houses will be built, yet the main mitigation of increased car usage to Tring Station (the car park of which is already full) is to improve the cycle lane. Given the report acknowledges Tring station is a particular challenge, why build so many houses with virtually no significant improvement in infrastructure?
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6924
<b>Person ID</b>	1263321
<b>Full Name</b>	TSEL Secretary TSEL

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>Tring Tornadoes Junior Sports Club (Tornadoes), is currently celebrating its 50th Anniversary year.</p> <p>Over the past 50 years, Tornadoes has grown from an initial 14 young boys at the first football session one Sunday morning on the field at Dundale Primary School, to today, a multi-sports (Football, Futsal &amp; Netball), multi-venue (Cow Lane, Pound Meadow, Mortimer Hill, Dundale Primary School, Grove Road Primary School, Tring School &amp; Tring Corinthians) club for circa 650 playing members aged 5 to 18 years old.</p> <p>As a consequence of our junior playing membership, we enjoy the support of an adult non-playing membership of circa 1,300 parents / guardians. Our club is operated entirely through Volunteers and in our current 2020/21 season there are circa 125 people involved in the running of our club and charitable organisation.</p> <p>As well as holding the England Netball Bronze Cap, Tornadoes has just recently been awarded Development Club Status by The Football Association, endorsing that we are an extremely well run club at both size and scale.</p> <p>Tornadoes Aim / Purpose for now 50 years has been:</p> <p>"to help and educate boys and girls through their leisure-time activities, so to develop their physical, mental and spiritual capacities that they may grow to maturity as individuals and members of society and that their conditions of life may be improved."</p> <p>Our responses to the DBC Local Plan 2020-2038 is set out below.</p> <p>Tornadoes Vision is that "Sport in general and junior sport in particular will continue to be a fundamental part of the fabric of the local community in Tring &amp; the surrounding villages and that Tring Tornadoes JSC will be the at the heart of sport for young people in the town now and forever".</p> <p>We note at 3.5 p21, the overarching vision for Dacorum adopted in 2020 "<i>working in partnership to create a borough which enables communities to thrive and prosper</i>". As a club Tornadoes embraces partnership &amp; collaboration and, as a registered charity, is ideally placed to be a Community Stewardship Management Partner to DBC in the future.</p> <p>We note at p23 The DBC Vision for Tring:</p> <p><i>Tring will have grown and will:</i></p> <ul style="list-style-type: none"> <li>• <i>be an inclusive market town that meets the needs and aspirations of existing and new residents and visitors;</i></li> <li>• <i>have delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape and protected environmental sites;</i></li> </ul>

- *have provided significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town;*
- *have delivered a mix of market and affordable housing, new community facilities, a new business hub, two primary schools and a secondary school;*
- *have provided significant new open space and sports/leisure facilities to the east of the town; and have benefited from further investment in transport infrastructure with active and attractive transport links within the town including new and improved pedestrian and cycle links to the town centre and Tring Station.*

Tornadoes expects the DBC Vision for Tring to be focused on delivering improvements in the town that meet the current and future needs of the existing population and to sustain all of the existing "green gateways" around the town, whilst massively increasing the amount of available playing space available to the existing, well established and very popular community clubs, in order that they may expand their activities and thus contribute further to the health, wellbeing and fabric of the local community that they serve.

At the centre of the future vision for Tring, DBC should be embracing the longstanding wishes of the towns sporting community that Tring Sports Forum (TSF) has lobbied tirelessly for over 15 years now, to create a substantial expansion of the sporting facilities for the clubs based adjacent to the Cow Lane Farm part of Dunsley Farm Tr01. The circa 18 hectares is shown below:

The TSF lobbying across Tring Town, Dacorum Borough and Herts County Council has always championed the case for Tornadoes to be the primary beneficiary of new football playing space. The Cow Lane Farm part of Dunsley Farm Tr01 is required to meet our current playing space shortfall and the playing space increases in demand that will arise from the LA5 build currently underway. This shortfall is well documented and evidenced in the DBC Playing Pitch Strategy and Action Plan June 2019 and the DBC Local Football Facilities Plan 2020.

Tornadoes though is a multi-sports club and as such, requires new and different types of playing facilities and, so, if there is to be substantial housing growth, then we, as an existing multi-location sports operator, would embrace a DBS Vision for sport in Tring that creates a series of sports hubs across the expanded town.

The formula from Sport England that provides a recommended benchmark guideline of 1.6 hectares of outdoor playing space per 1,000 population suggests that 2,730 new houses should produce (using the 2.5 multiplier) net new playing space of 8 hectares. If that net new sports provision is to be part of Tr03, then Tornadoes preference would be for the new sports / community hub to be situated at the Station Road end of Tr03, in close proximity to the existing sports hub and the to be created hub in Tr01.

As the main thrust of the Local Plan consultation is centred on housing numbers and types, Tornadoes deliberations are centred on how the DBC Vision for Tring will satisfy the needs of our young people.

Our current U18 Age Group will be 35 in 2038 and our current U6 Age Group will be 22.

So, given DBC haven't asked them what they want their town to look like in 17 years' time, or how they want it to evolve and develop between now and then, we highlight, on their behalf, that the DBC Vision for Tring should have our young people as the primary consideration for anything proposed in the town. That then means DBC should prioritise this above all else and irrespective of any future housing development:

- *have provided by the end of 2021 significant new open space and sports/leisure facilities to the south and east of the town; and have benefited from further investment in transport infrastructure with active and attractive transport links within the town including new and improved pedestrian and cycle links to and from the town centre, LA5, Cow Lane, all of the schools and Tring Station.*

Adding in circa 7,000 more people to the population in Tring brings with it a substantial increase in young people over the Plan period. Projecting that half the increase is young people and say 25% of them join Tornados, then our club would, at a minimum, double in size.

On behalf of the young people we are responsible for, Tornados contributes as follows:

- On p25 *Delivering Dacorum's Future with Homes for Everyone*
  - **To increase the number of new and truly affordable homes, explicitly to enable all the young people of Tring who want to, to be able to afford to buy a house in their own town when they grow up.**
- On p26 *Supporting Community Health, Wellbeing and Cohesion*
  - **To enable and support active lifestyles through the provision of open space, sports and recreation facilities, at a scale that meets (and ideally exceeds) the forecasted increase in required capacity before new houses are built.**

Within the Strategic Objectives, it is also imperative that DBC makes the necessary improvements and enhancements to the existing sports and recreation facilities ahead of any new homes being built, starting with Pound Meadow.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS6927

**Person ID**

1265116

**Full Name**

andrew Koutsou

**Organisation**

Me - resident

**Agent ID**

1265101

**Agent Full Name**

andrew  
koutsou

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

<b>Comment</b>	No- Because i dont you think are delivering on what you have set out to do based on your action plan for proposed development. Theme 3 and 4 are in direct opposition to your proposed plan in tring and many of the local residents feel this way
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6930
<b>Person ID</b>	1265088
<b>Full Name</b>	catherine Hay
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The vision is entirely unsuitable. The number of houses proposed is not in line with the latest figures. This whole plan is based on out of date information. DBC is fully aware of this, yet the proposal in the this current state is still being put forward. Why?</p> <p>DBC recognise the climate emergency on one hand, but when it suits them is happy to propose the construction of numerous unnecessary homes.</p> <p>Central government proclaims that the green belt should only be built on in exceptional circumstances yet here are plans to ravage numerous parcels of green belt based on out of date figures.</p> <p>The world and our community is a very different place since Covid, and to go by a plan developed pre covid would be disasterous. lifestyles, business practice and much more has changed. We will likely find ourselves will huge areas of un used office spaces which could be converted to residential.</p> <p>The addition of all these unnecessary homes which will not address the shortage of affordable houseing will merely attract people from London to move to the borough.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6933

<b>Person ID</b>	1265114
<b>Full Name</b>	Kirsten McGregor
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	There is no need for such overwhelming growth....the amount of houses planeed to be built far outweighs the infracture to support the huge influx of peope into the area.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS6969
<b>Person ID</b>	1262099
<b>Full Name</b>	Chris Taylor
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>In theory, the vision DBC have positioned with local residents is one that we should all sign up to, but on closer investigation, this is about how many new houses can be built upon Greenfield land which I find abhorrent.</p> <p>I believe that Dacorum's vision is fundamentally flawed because it is based on out-of-date 2014 household projections which over-estimate demand and prioritise growth at the expense of other considerations such as the importance of the Green Belt:</p> <p>The Council's proposals are neither justifiable nor sustainable</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7011
<b>Person ID</b>	1265129
<b>Full Name</b>	Karen Foxwell-Moss
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The proposed growth is far too much for the town. Possibilities for improvement to the existing transport networks to allow for said growth are incredibly limited by lack of space in the historic market towns and the location of proposed developments at the top of hills and along ridges. Moreover, it is green belt land and the character and beauty of the towns will be decimated to meet a target that is not ratified and has not been challenged. It is preposterous to make such devastating changes while we are living in unprecedented and unpredictable times due to COVID-19.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7025
<b>Person ID</b>	1145885
<b>Full Name</b>	Dr Oliver Pengelley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

* No	
<b>Comment</b>	<p>The introduction to this plan (1.29) talks about how green belt and AONB landscape are significant constraints to development. It seems that this plan and its vision and objectives are, in their entirety, missing the point. We are hugely lucky to live in such a beautiful part of the world. We should not view this beauty as a constraint, but something to be cherished and protected. It is under threat from the climate emergency, which this plan acknowledges, but it is hard to view this plan as anything but another brick in the wall of human destruction of the natural world.</p> <p>The council has a duty to protect the environment and character of the Dacorum, as well as to meet central government objectives. It should be seeking to protect the area from over-development, not encouraging it - which the total numbers of proposed new dwellings and consequences on infrastructure and transport will ultimately result in.</p> <p>While some housing will be required, it makes sense to include the bulk of this in Hemel Hempstead where possible, to encourage positive development of the town and support a town centre which - despite recent regenerative projects - feels like it is failing, particularly in its retail dimension. The proposals to Tring and Berkhamsted in particular promise to sandwich housing next to the noisy A41 (Berkhamsted) and wholesale environmental destruction and rampant overdevelopment (Tring). These are towns where the historic size and physical dimensions of the built environment in their town centres mean that there is a maximum population they can realistically support without becoming overcrowded, Berkhamsted is already at its limits and these proposals would take Tring far in excess of them.</p> <p>Furthermore, to be committing to specific development targets in the middle of a pandemic which is undoubtedly going to have lasting consequences on the use of land and space seems inadvisable. It is clear that the nature and extend of required office space is going to be forever changed, and this plan does not allow for this. It may be possible that former office sites will contribute to housing development targets for example. To be committing to these targets when legislative changes to planning and housing provision are imminent, and when other authorities have paused their plans, also seems highly questionable, and I cannot see a convincing case for this presented anywhere in the plan or associated documentation.</p> <p>The introduction acknowledges that Dacorum does not exist in isolation from other local authorities (1.30), but why then is no mention made of the significant expansion of residential housing surrounding Aylesbury, or the proposed development of RAF Halton? The plan ought to consider the development context of the areas surrounding Dacorum, as this should inform the spatial hierarchy of which it is part. If it is proposed to increase development in Hemel, and the sizeable expansion is say Aylesbury is taken into account, is it then appropriate to continue infilling the small er towns in between in Tring and Berkhamsted.</p> <p>While this plan's overarching vision contains some admirable objectives, it is hard not to read it as a developer's charter and one that does not give specific consideration to the people who most deserve it, the local residents of the Borough.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7026

<b>Person ID</b>	1263321
<b>Full Name</b>	TSEL Secretary TSEL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Tring Tornadoes Junior Sports Club (Tornadoes), is currently celebrating its 50th Anniversary year.</p> <p>Over the past 50 years, Tornadoes has grown from an initial 14 young boys at the first football session one Sunday morning on the field at Dundale Primary School, to today, a multi-sports (Football, Futsal &amp; Netball), multi-venue (Cow Lane, Pound Meadow, Mortimer Hill, Dundale Primary School, Grove Road Primary School, Tring School &amp; Tring Corinthians) club for circa 650 playing members aged 5 to 18 years old.</p> <p>As a consequence of our junior playing membership, we enjoy the support of an adult non-playing membership of circa 1,300 parents / guardians. Our club is operated entirely through Volunteers and in our current 2020/21 season there are circa 125 people involved in the running of our club and charitable organisation.</p> <p>As well as holding the England Netball Bronze Cap, Tornadoes has just recently been awarded Development Club Status by The Football Association, endorsing that we are an extremely well run club at both size and scale.</p> <p>Tornadoes Aim / Purpose for now 50 years has been:</p> <p>"to help and educate boys and girls through their leisure-time activities, so to develop their physical, mental and spiritual capacities that they may grow to maturity as individuals and members of society and that their conditions of life may be improved."</p> <p>Our responses to the DBC Local Plan 2020-2038 is set out below.</p> <p>Tornadoes Vision is that "Sport in general and junior sport in particular will continue to be a fundamental part of the fabric of the local community in Tring &amp; the surrounding villages and that Tring Tornadoes JSC will be the at the heart of sport for young people in the town now and forever".</p> <p>We note at 3.5 p21, the overarching vision for Dacorum adopted in 2020 "<i>working in partnership to create a borough which enables communities to thrive and prosper</i>". As a club Tornadoes embraces partnership &amp; collaboration and, as a registered charity, is ideally placed to be a Community Stewardship Management Partner to DBC in the future.</p> <p>We note at p23 The DBC Vision for Tring:</p> <p><i>Tring will have grown and will:</i></p>

- *be an inclusive market town that meets the needs and aspirations of existing and new residents and visitors;*
- *have delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape and protected environmental sites;*
- *have provided significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town;*
- *have delivered a mix of market and affordable housing, new community facilities, a new business hub, two primary schools and a secondary school;*
- *have provided significant new open space and sports/leisure facilities to the east of the town; and have benefited from further investment in transport infrastructure with active and attractive transport links within the town including new and improved pedestrian and cycle links to the town centre and Tring Station.*

Tornadoes expects the DBC Vision for Tring to be focused on delivering improvements in the town that meet the current and future needs of the existing population and to sustain all of the existing "green gateways" around the town, whilst massively increasing the amount of available playing space available to the existing, well established and very popular community clubs, in order that they may expand their activities and thus contribute further to the health, wellbeing and fabric of the local community that they serve.

At the centre of the future vision for Tring, DBC should be embracing the longstanding wishes of the towns sporting community that Tring Sports Forum (TSF) has lobbied tirelessly for over 15 years now, to create a substantial expansion of the sporting facilities for the clubs based adjacent to the Cow Lane Farm part of Dunsley Farm Tr01. The circa 18 hectares is shown below:

The TSF lobbying across Tring Town, Dacorum Borough and Herts County Council has always championed the case for Tornadoes to be the primary beneficiary of new football playing space. The Cow Lane Farm part of Dunsley Farm Tr01 is required to meet our current playing space shortfall and the playing space increases in demand that will arise from the LA5 build currently underway. This shortfall is well documented and evidenced in the DBC Playing Pitch Strategy and Action Plan June 2019 and the DBC Local Football Facilities Plan 2020.

Tornadoes though is a multi-sports club and as such, requires new and different types of playing facilities and, so, if there is to be substantial housing growth, then we, as an existing multi-location sports operator, would embrace a DBS Vision for sport in Tring that creates a series of sports hubs across the expanded town.

The formula from Sport England that provides a recommended benchmark guideline of 1.6 hectares of outdoor playing space per 1,000 population suggests that 2,730 new houses should produce (using the 2.5 multiplier) net new playing space of 8 hectares. If that net new sports provision is to be part of Tr03, then Tornadoes preference would be for the new sports / community hub to be situated at the Station Road end of Tr03, in close proximity to the existing sports hub and the to be created hub in Tr01.

As the main thrust of the Local Plan consultation is centred on housing numbers and types, Tornadoes deliberations are centred on how the DBC Vision for Tring will satisfy the needs of our young people.

Our current U18 Age Group will be 35 in 2038 and our current U6 Age Group will be 22.

So, given DBC haven't asked them what they want their town to look like in 17 years' time, or how they want it to evolve and develop between now and then, we highlight, on their behalf, that the DBC Vision for Tring should have our young people as the primary consideration for anything proposed in the town. That then means DBC should prioritise this above all else and irrespective of any future housing development:

- *have provided by the end of 2021 significant new open space and sports/leisure facilities to the south and east of the town; and have benefited from further investment in transport infrastructure with active and attractive transport links within the town including new and improved pedestrian and cycle links to and from the town centre, LA5, Cow Lane, all of the schools and Tring Station.*

Adding in circa 7,000 more people to the population in Tring brings with it a substantial increase in young people over the Plan period. Projecting that half the increase is young people and say 25% of them join Tornadoes, then our club would, at a minimum, double in size.

On behalf of the young people we are responsible for, Tornadoes contributes as follows:

- On p25 *Delivering Dacorum's Future with Homes for Everyone*
  - **To increase the number of new and truly affordable homes, explicitly to enable all the young people of Tring who want to, to be able to afford to buy a house in their own town when they grow up.**
- On p26 *Supporting Community Health, Wellbeing and Cohesion*
  - **To enable and support active lifestyles through the provision of open space, sports and recreation facilities, at a scale that meets (and ideally exceeds) the forecasted increase in required capacity before new houses are built.**

Within the Strategic Objectives, it is also imperative that DBC makes the necessary improvements and enhancements to the existing sports and recreation facilities ahead of any new homes being built, starting with Pound Meadow.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7058
<b>Person ID</b>	1265133
<b>Full Name</b>	Sarah Storey
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
<b>* Yes</b>	

* No	
<b>Comment</b>	There is no legitimate basis for Dacorum's development target which is based on 2014 ONS housing estimates rather than the more recent 2018 estimates. Huge increases in planned housing in areas such as Berkhamsted and especially Tring (55% increase) are disproportionate and will destroy the unique character of these market towns. There is inadequate infrastructure (schools, GPs, transport) already in Tring and development on the scale proposed is completely unsustainable. Finally but not any less importantly, this proposal would destroy vast areas of countryside in the Chilterns Area of Outstanding Natural Beauty. Any bureaucrat/political hack who supports this scheme clearly has not spent any meaningful time in this area and will pay a high price at the ballot box.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7060
<b>Person ID</b>	1265127
<b>Full Name</b>	Jason Foxwell-Moss
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	There is no justification for, or evidence supplied for the exceptional circumstances required for building on huge tracts of green belt. We have no idea of what lays ahead in a post-COVID world, and the data used to plan building such a huge volume of additional housing, with the associated strain on local infrastructure and character of the surround countryside is old; we should take a breath, re-examine the needs and if necessary, plan a strategy based on new data, and real evidence. We simply don't know how many new houses we'll really need. Businesses all over the world are reassessing their planning in this way - there's no reason why we should not be doing the same.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7064
<b>Person ID</b>	1265144
<b>Full Name</b>	Michael Williams

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Over-provision of housing based on inaccurate and superseded data I believe the council's vision is flawed as it is based on out of date ONS data which has led to a significant over-estimate of Dacorum's housing needs.</p> <p>The predicted levels of growth and hence yearly targets for associated housing development are too high. Climate Emergency Issues Dacorum Borough Council has declared a climate emergency and indicated that this should be a central pillar in any future plans for the borough. This local plan vision as published prioritises economic growth and greenfield land development over considerations for the climate emergency. 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. Protecting Green Belt land &amp; 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)</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7096
<b>Person ID</b>	1146005
<b>Full Name</b>	Mr Nick Hollinghurst
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	<p>1. The vision and strategy remains based on the social and economic assumptions of the last decade.</p> <p>2. In particular the disproportionately heavy residential development proposed for Tring &amp; Berkhamsted (but especially for Tring) is not based on local growth or even on any rational criterion, but seems to depend on attracting people out from London to the 2 towns where there is insufficient local employment, thus intensifying London-based commuting along an already overcrowded railway.</p> <p>3. Insufficient attention appears to have been given to encouraging cheap, reliable and frequent bus travel (once upon a time both HCC and DBC contributed significantly to this objective) nor to a modernised and effective taxi service that gives drivers a decent living and the customers affordable and safe beske transport.</p> <p>4. No account has been taken of Brexit which has now resulted a significant outflow of temporary residents back to Eastern Europe.</p> <p>5. Similarly the likely shift of economic activity away from London and the East Coast towards ports in the south, the west and to Scotland.</p> <p>6. The attention given to mitigating climate change by actions the council could take e.g. (a) encouraging every school (normally surrounded by playing fields) to obtain background heating from ground source heat pumps (b) installing more PV panels on more roofs (c) moving to all-electric vehicles for all uses. (d) upgrading IT connectivity to enable greater electronic interaction for residents outside Hemel Hempstead at local offices thus obviating physical trips to The Forum.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7146
<b>Person ID</b>	1264183
<b>Full Name</b>	Hartley Milner
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I will leave the specifics to others who are better resourced to respond to the Local Plan in depth. My comments are more general and relate to what I see as the plan's long-term impacts on the borough, even beyond 2038.

I am not exaggerating when I say the consultation document left me feeling as if I had just read the opening chapter of a dystopian novel. The proposals made for chilling reading in terms of what they mean for the borough's countryside, ecology and wildlife. Strip away the green packaging and old-style growth policies are laid bare that are unsustainable and clearly incompatible with the council's declared aims ... to "include all available measures to cut carbon emissions and reduce the impact on the environment," "protect species and priority habitats" and "provide a 10% net gain of biodiversity".

The challenge for local politicians is to balance economic growth with the need to protect the natural environment. Their dilemma is that the two demands are contradictory and cannot be reconciled. And in this conflict of opposing interests it is the natural world that comes off second best every time, as I have seen played out repeatedly during 71 years living and working in the borough. My childhood was filled with the sights and sounds of nature; squadrons of swifts screaming down country lanes, nightingales singing in the bluebell woods where I played, barn owls on silent wings quartering wildflower meadows rich in butterflies and bees, the drumming of woodpeckers, the lofty song of the skylark and always the iconic sound of spring, the cuckoo. Now, almost one-fifth of species found in Hertfordshire are threatened with extinction while 76 species have vanished from the county altogether, according to Herts and Middlesex Wildlife Trust's latest State of Nature report.

Where our countryside has been degraded it can be made more welcoming for wildlife, but where it is lost to development and infrastructure delivery it is lost forever. Modern housing is laid out in ever-higher densities that provide scant opportunities for nature to take hold at a time when traditional garden refuges are increasingly coming under threat from pressures to lift restrictions on backland infilling. At the rate of growth proposed, the borough's countryside will be reduced to pockets of parkland prioritised to meet the leisure needs of an ever-burgeoning human population to the exclusion of diverse natural environments.

As for reducing carbon emissions, I can find nothing in the Local Plan to support this ambition in terms of meeting national climate targets of net zero by 2050. Local plans need to set out how emissions will be radically reduced in line with carbon budgets by providing a CO2 reduction pathway specific to their area. They also need to explain how carbon budgets will be regularly and effectively monitored. Dacorum council acknowledges that however low the energy performance requirements within the Plan development is still likely to "generate unavoidable carbon emissions" which will need to be offset in order for the borough to become net zero carbon. Offsetting proposals include increasing the area of habitats that fix and store CO2, including planting trees and woodland. However, to be effective vast tracts of land will be required, not only to compensate for emissions arising from the provision of new developments but also for the resulting loss of 850 hectares of natural carbon sink sites within the green belt, the wider countryside and urban areas. This will inflict a double blow on efforts to meet climate targets.

Habitat creation and rewilding will be crucial to reversing biodiversity decline, but woodland can be problematic in terms of their impact on greenhouse gases. While housing and commercial buildings can spring up in a matter of months, it can take 40 years before a tree reaches maturity and is able to lock away significant amounts of carbon. Plus, natural ecosystems have evolved to look after themselves while manmade habitats require ongoing management and protection. I cannot say I have a great deal of confidence that this will be provided, or that these sites will not eventually suffer the same fate now facing swathes of the green belt. Taking all the above and other factors into consideration, I see only the

borough's greenhouse gas emissions rising above current levels into the distant future, at a time when scientist warn that the planet has already crossed a series of climate tipping points.

Yes, if ever there was a case of local politicians being 'damned if they do, damned if they don't' it is encapsulated in the Dacorum growth strategy to 2038. But that is not to let them off the hook. We have reached the Rubicon in terms of the amount of new development the borough can absorb without having catastrophic implications for the environment and therefore for the wellbeing of us all. In this respect, Dacorum can be viewed as a microcosm of what is happening across the county, the UK and indeed the entire planet. We are all culpable for contributing to the environmental challenges the world faces today, but as our leaders and lawmakers politicians at all levels carry a special responsibility. That is to collectively achieve important goals individuals cannot achieve on their own. In this respect, they have let us down woefully by their failure to heed warnings echoed across the decades about the dire consequences of humankind's exploitive activities on the Earth and its finite resources.

Even now, at this defining moment for the survival of all life on the planet, I am not sure politicians have got their heads around the full scale of the emergency. Only rarely has the issue that has hitherto dared not speak its name tripped off the lips of other than a few environmentalists and academics ... human population growth. Yet the consumption demands of an ever-expanding global population (currently 7.8 billion, estimated to reach 11 billion by 2050) are increasingly viewed by 'those in the know' as the core cause of the environmental challenges that now confront us.

Dacorum's population is projected to reach 177,000 by mid-2041 (Herts Insight). However, the housing levels set out in the borough's growth strategy suggest that the actual figure will be significantly higher by then. Until politicians acknowledge that indefinite population growth is physically impossible on land that is finite, I cannot have confidence in their stewardship of our green spaces or in their commitment to any outcomes from the crunch UN Cop 26 talks the UK will be hosting later this year.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7149

**Person ID**

1146005

**Full Name**

Mr Nick Hollinghurst

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7151
<b>Person ID</b>	1261685
<b>Full Name</b>	Ian Edwards
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The overarching vision is commendable, but I believe the plan is based on flawed and out of date data and any real understanding of post-pandemic changes to our way of living.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7163
<b>Person ID</b>	1265154
<b>Full Name</b>	Beth Williams
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The overall number of new dwellings for Dacorum seems vastly excessive given the shift in working patterns that have occurred during the COVID-19 pandemic. Dacorum has a significant population of London commuters who have been

working from home for almost a year. Many of those will continue to work from home either full time or part time. Shifts to remote working mean that the typical 'move out of London' to Berkhamsted, Tring etc, (as well as other local dormitory towns outside of Dacorum) will decrease as being in commuting distance of London is much less of a priority. I do not see that this shift has been addressed anywhere.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS7176

**Person ID** 1265157

**Full Name** Lynnsey Walker

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** The plan in so far as it impacts Berkhamsted is ill thought out. Destroys precious woodland and open land and does not provide for enough infrastructure to support the additional homes e.g. schools; provision of GP's. The High Street is already unable to cope with the volume of traffic and there is nothing in the plans to improve this. On the contrary, it will become far worse.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS7182

**Person ID** 1265131

**Full Name** Malcolm Appleford

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>It is not possible to build 'homes for everyone', 16,000 homes is already far too many.</p> <p>You haven't demonstrated how a 'vibrant economy with opportunities for everyone' will be achieved.</p> <p>Dacorum will be less clean, far less green and less attractive.</p> <p>It will become a bigger dormitory town for London.</p> <p>Transport within Dacorum will depend almost entirely on cars. Increasing pollution enormously.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7209
<b>Person ID</b>	1264956
<b>Full Name</b>	Caroline Heard
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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</p>

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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7215

**Person ID**

1265027

**Full Name**

Saba Poursaeedi

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I think this is a pointless question. Vision is one thing, implementation is another and I believe while the plan can be dressed with good intentions, the reality they will create will be far from in line with making Dacorum better

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7222

**Person ID**

1265168

**Full Name**

Jo Slade

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

## Comment

Whilst the Council's Vision is highly commendable in terms of vision and strategic objectives the plan itself appears to largely focus on building new homes and where they are to be located. There is little underpinning rationale to suggest that the increase in total dwellings is sensible or even sustainable.

For Tring specifically, where I live, there is a proposed increase of 2,700+ new houses increasing the size of Tring by 55%. Most of this housing will destroy much of Tring's surroundings and Green Belt - uprooting ancient hedgerows and trees and negatively impacting the quality of our countryside, wildlife and environment. I also understand that the focus on building on Green Belt is counter to national Planning Policy and the government's position that Green Belt should only be developed in exceptional circumstances. The Council makes no effort to explain what the exceptional circumstances are in Dacorum and this needs further explanation before any approval can be given.

There is little evidence of Section 1.30 'Working with Others' being applied in my local area. Tring is bounded on two sides by Buckinghamshire whose plans have a direct and significant bearing on employment, traffic, local land use, etc. There appears to be no reference to Aylesbury Vale District Council or Buckinghamshire, and few to local villages in that county, contrary to NPPF para 35c. For example, the planned development of RAF Halton is proposing c1000 new homes and is only 4-5 miles from Tring. This is a concern that may have led to potentially flawed conclusions on matters ranging from employment to the siting of additional retail.

The proposed growth requires a more robust stance in my opinion to ensure that the plan does not adversely impact the environment and climate, for example by referencing DBC's Climate Emergency Declaration and zero carbon target of 2030. Also, the proposed growth suggests substantial additional traffic with over an additional 3-4000 cars to the locale plus the necessary lorries and delivery vehicles associated with such a growth.

In Section 2.12 'Vibrancy of Town Centre' there is little consideration to how to retain the local personality of towns. Tring has a very "market town" distinctiveness and there is no opportunity or plan to maintain / enhance this within the proposals especially given the need to support a larger local population. As suggested by others there are over 20 references to the importance of local distinctiveness in the Plan, e.g., page 22: *'All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.'* I strongly support this position but, as mentioned above, am concerned that there are no references to what makes Tring distinctive, or to a process by which that will be agreed and at what stage it will become binding within the plan.

I strongly feel that this needs to be formally addressed. Placed at an important ancient crossroads, Tring's market heritage is deeply rooted, it has a track record of many 'firsts' including clean water supply, land set aside for public amenity and nature conservation and water and wind-based energy generation and is also located in the midst of more SSSIs and officially designated natural beauty than other locations in Dacorum.

Can we please have some specific local questions addressed to help understand what the plan means for our local places? E.G

- There is no joined-up cycle and footpath plan for Tring and there are gaps where this extends beyond residential or connecting streets.
- There is no suggestion of any "re-wilding" to compensate for the loss of local green spaces

- How will the viability of Tring as a market town be maintained with such an increased population and associated pressure on a town centre that will have to accommodate more traffic?
- How can sensitive views and landscape be maintained?.
- How will green spaces be re-purposed for the community to enjoy? For example,

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS7248

**Person ID** 1264957

**Full Name** Mike Connell

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Comment** I am concerned that the proposed link roads for hemel hempstead have not been given enough consideration since they will be key to the success of the plan

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS7301

**Person ID** 358532

**Full Name** Ms Gillian Culham

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

PE41 “Haslam Playing Fields” – Shooters Way.

10 SA Objective – This site would certainly discourage walking for normal everyday use such as going shopping – with small children pushing prams – heavy shopping and at the other end of the spectrum – where walking such gradients are not conducive to health either.

Policy SP20 BK07 P307 Lockfield Northchurch

Will you be losing the current facilities of the special needs people and the allotments? I hope you can incorporate this in your new plan, of housing and the garden centre. Sound proofing of all properties in the area regarding the neatness of the rail line, no doubt would maybe (trees/hedging) be appreciated by all.

Berkhamsted Homes P224 23.107 BK11 Billet Lane (Jewsons) SP20 P228.

This company – is a vital part of the community for the Berkhamsted area – needs keeping – As you are going to construct all these properties they are the perfect people to assist in this. I feel that this is the perfect site not far from the high street, within easy walking distance to the town/Northchurch to travel to Northbridge road (if it was to move). It is extremely difficult as it's up an extremely steep incline – because of the canal bridge. This area is okay if you have transport but not if otherwise (walking).

Map 39 – keep the front section for Jewsons there would still be room for housing at the rear. There is still room at the side if Jewsons in previous wood site.

Growth area BK12, P313 Civic Centre

Map 40

Where will the police station be located?

If you keep the front façade will it still be used by the council for current facilities?

Where will this all be placed?

This all needs to be located in the centre of town, visible to all, easy to find.

P22 Overarching vision for Dacorum's Growth by 2038.

At the moment, in my view – bungalows do not meet current requirements, there is much to be improved. As one gets older the front garden size is not so required, where as another couple of rooms internally would be better appreciated, giving space for all sort of things – dining room - craft room – visitors – office – library – or any other reason – keep fit etc.,

These improvements would be financially viable than building from scratch, even if you had to give up the right to buy to transfer to something like this with a larger footprint (to keep council stock) you would have people queueing up to vacate their larger properties to move to somewhere like this, more suitable, especially being on one level, as well as a smaller garden to maintain (as they have built over it).

When the current bungalows were built, people had different expectations in life - to build more bungalows but with two bedrooms as normal would be a step forward an improvement to the health and wellbeing of their occupants. Also to enlarge the current one bedroom flats into two bedrooms build out another 8ft so the Juliette balconies living room becomes a communal work/extra bedroom space as there is plenty of unused greenery in the remaining = car space.  
(SEE DIAGRAM IN FULL PDF RESPONSE)

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7310

**Person ID**

1265182

**Full Name**

JAMES NODDER

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I feel the proposal will overwhelm the town and stretch the already struggling infrastructure.

I understand that the proposed scale of development is based on out of date ONS data, and newer ONS statistics suggest a requirement which is about half the size.

The impact on the environment does not seem to have been fully taken into account. Lack of adequate infrastructure provision.

**Included files**

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7326
<b>Person ID</b>	864107
<b>Full Name</b>	Mr Antony Hetherington
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS7337
<b>Person ID</b>	1207259
<b>Full Name</b>	Mr Graham Bright
<b>Organisation</b>	Chairman Grove Fields Resident Association
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Hemel Hempstead’s housing growth is delivered with a 34% provision of Green Belt allocated land, whereas in Tring the allocation requires 81% Green Belt land allocation. This cannot be right!!</p> <p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS7347
<b>Person ID</b>	1262256
<b>Full Name</b>	Sarah Marshall
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7397
<b>Person ID</b>	1262537
<b>Full Name</b>	Josephine Horder
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7403
<b>Person ID</b>	1265377

<b>Full Name</b>	PHILIP MOORES
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt. Such growth would clearly support the development of Hemel Hempstead into a world class urban environment.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to " play a much greater role in delivering housing growth " within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty. This development is directly opposed to the vital need to ensure a green recovery from the COVID-19 pandemic.</p>

I strongly object to your claim that your vision of Tring has " delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. " This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

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The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7417
<b>Person ID</b>	1265380
<b>Full Name</b>	JON WRIGHT
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7429

**Person ID**

1265381

**Full Name**

DR SUE DAVEY

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built</p>

infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7549

**Person ID**

1160566

**Full Name**

Roger Welchman

**Organisation**

Associate  
AR Planning

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

<b>Comment</b>	The penultimate bullet point should be changed from: 'be protected from development' to 'Support appropriate levels of development'
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7576
<b>Person ID</b>	1265614
<b>Full Name</b>	JACKIE BARKER
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was</p>

shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

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I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

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The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7603
<b>Person ID</b>	1143218
<b>Full Name</b>	Mr Terry Cartmell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate</p> <p>Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

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**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS7618
<b>Person ID</b>	1207710
<b>Full Name</b>	Penny Bennetts
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I am looking at the leaflet that came to the house Page 5 and the vision and strategic objectives are admirable.</p> <p>I think the local plan should be underpinned by the concerns of the 21st century particularly climate change, sustainability and healthy living for our residents in Dacorum. I do not get a sense that these values are truly central to the plan. I am glad to see the council declared a Climate Emergency last year and this is reflected in the "fine words" of the objectives which but this plan looks like business as usual.</p> <p>Will there be:-</p> <p>wide bike/walking paths? Also bike storage. wildlife corridors and new mixed tree planting? new allotments and communal gardens?</p> <p>open places in the new neighbourhoods?</p> <p>Why am I unconvinced that any agreed levels of affordable housing will not be eroded?</p> <p>Open places were a great feature of Hemel as a new town all those years ago and make the place far more pleasant and healthy to live in.</p> <p>I would be in support if the new homes included green features such as: solar panels natural ventilation a high standard of insulation electric car chargers rainwater storage facilities areas designated for dog walking</p> <p><b>CONCLUSION</b></p> <ul style="list-style-type: none"> <li>- far too many homes</li> <li>- loss of green belt land and wildlife habitat</li> <li>- damage to the district's urban and villages' character</li> <li>- too much pressure on local infrastructure and services</li> <li>- housing should include a radical range of sustainable features</li> </ul>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7636
<b>Person ID</b>	1265748
<b>Full Name</b>	Mr Roger McVey
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by

way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7650

**Person ID**

1265752

**Full Name**

Mrs Flora Moores

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7669
<b>Person ID</b>	1261784
<b>Full Name</b>	Nigel Vanner
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7682

**Person ID**

1265757

**Full Name**

JENNIFER GAIL FREER

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

—NO - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.  
 —Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.  
 — We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS7695

**Person ID**

1265614

**Full Name**

JACKIE BARKER

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.</p>

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<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7709
<b>Person ID</b>	1265765
<b>Full Name</b>	Miss Inma Rodriguez
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

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**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS7733

**Person ID** 1265778

**Full Name** Councillor Lara Pringle

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment**

—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London. The idea that increasing housing supply will reduce prices, is unrealistic when demand for housing is generated by the increasing investment value of housing stock.

—Developer led housing will not provide more social housing for those on the waiting list. It will mainly benefit developers.

— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people. There is seems to be little evidence of any strategy, other than a laissez-faire release of green belt land to meet local housing need.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS7792

**Person ID** 1148738

**Full Name** Ian and Claire Field

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is simply too high for Dacorum. The figure of 922dpa is more houses than are currently allocated to be built in Hull, Plymouth, Reading and Wolverhampton, all of which are large cities, not historic market towns such as Berkhamsted, or villages surrounded by AONB such as Bovingdon and Markyate, as proposed in the Dacorum plan.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.</p> <p>In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85% of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account and not ignored or we will lose precious rural, Green Belt and AONB land forever.</p> <p>In addition, the strategy fails to take into account the combined impacts of the Covid 19 Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.</p> <p>The Council’s proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7808
<b>Person ID</b>	1265909
<b>Full Name</b>	Peter Evans
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

<p>* Yes</p> <p>* No</p>	
<p><b>Comment</b></p>	<p>While the overarching vision and objectives given seem useful, I do not agree with the vision for Tring. The proposal for increased housing in Tring and use of Green Belt land appears to directly go against the principles of a) conserving and protecting the natural environment, b) mitigating and adapting to climate change and c) promoting the distinctiveness of towns and villages, and d) protecting and enhancing Dacorums distinctive historic environment.</p> <p>The housing allocation set for Dacorum is unreasonably high. The Local Plan 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. This growth in household numbers is a 25% increase over the current housing stock. 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 simplistic algorithm.</p> <p>The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects. The plan does not therefore demonstrate evidence for objectively assessed need.</p> <p>Within the overall housing plans within Dacorum, the proposed number of houses suggested for Tring are highly disproportionate representing a 55% increase in housing (2700 houses).</p> <p>This assessment of housing need then places a significant risk to the heritage of the area, protected landscapes and Green Belt.</p> <p>Any new development on sites to the east of Tring intrinsically would fail to take account of sensitive views, landscape and protected environmental sites. The governments own advice says that ‘meeting housing need is never a reason to cause unacceptable harm to such places’. No evidence to justify unquestionable damage to Green Belt and AONB is given.</p> <p>There is an overarching aim within the Local Plan of ensuring developments protect and enhance the distinctiveness and historical importance of towns and villages. This seems completely at odds with the proposed plans for Tring in particular, where bolted on developments are likely to significantly detract from the distinctiveness of a small historic market town surrounded by AONB, Green Belt and SSSI’s. It is likely to detract significantly from the enjoyment, health and well being of current and future residents.</p> <p>The idea that existing residents and visitors to Tring would gain greater benefit from larger and larger developments are not justified in the plan or any supporting evidence. I strongly disagree with this proposition.</p>
<p><b>Included files</b></p>	
<p><b>Consultation Point</b></p>	<p>Borough Vision to 2038</p>
<p><b>Comment ID</b></p>	<p>EGS7830</p>
<p><b>Person ID</b></p>	<p>1265915</p>
<p><b>Full Name</b></p>	<p>Mr Stephen Trueman</p>

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built</p>

infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7851
<b>Person ID</b>	1265917
<b>Full Name</b>	Max Dinning
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The current version of the plan does not adequately address four of its own objectives: 'Mitigating and adapting to climate change', 'Conserving and protecting the natural environment', 'Promoting and facilitating sustainable transport and connectivity' and 'Supporting community health, wellbeing and cohesion'.
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7862
<b>Person ID</b>	1265975
<b>Full Name</b>	Clare Smith
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Section (3)  Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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 my opposition to this draft Plan. DBC should revert to the Core Strategy vision statement.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7884
<b>Person ID</b>	1265985
<b>Full Name</b>	PAUL ELLERAY
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Do you think the overarching vision and strategic objectives are right for the Borough?</p> <p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7897
<b>Person ID</b>	1265991
<b>Full Name</b>	NICHOLAS MORGAN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>1/ Do you think the overarching vision and strategic objectives are right for the Borough?</p> <p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7930
<b>Person ID</b>	1262335
<b>Full Name</b>	Penelope Harrison
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7931
<b>Person ID</b>	1265997
<b>Full Name</b>	ROSE SHERIDAN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	1/ Do you think the overarching vision and strategic objectives are right for the Borough? No - the focus is on multiple developer led building of an excessive number of houses and does not look to build and maintain sustainable communities. In particular there is inadequate affordable housing targeted to the average wage for the area and social housing. There is inadequate consideration of the environment, zero carbon and considerations for

climate change. There is inadequate/no strategic consideration of primary care, hospital provision, public transport or transport arteries both road and rail.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS7952

**Person ID** 1266002

**Full Name** ROXANNE RANSLEY

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

No

**Comment** There appears to be little overall vision, no priority given to reducing carbon use and no concept of maintaining places within Dacorum.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS7965

**Person ID** 1266006

**Full Name** SUE ELLERAY

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

No

<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS7989
<b>Person ID</b>	1266015
<b>Full Name</b>	SOPHIE WHITTON
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>1/ Do you think the overarching vision and strategic objectives are right for the Borough?</p> <p>a) No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>b) Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers. We need a properly thought-out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8021
<b>Person ID</b>	1266029
<b>Full Name</b>	JAN AND GORDON BULLOCK
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The Vision The vision emphasises environmental sustainability and highlights the potential to deliver new green spaces, but fails to mention that the cost of delivering the Vision is a 25% increase in houses and population and the loss of 2000 acres of Green Belt and open spaces across the Borough.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8044
<b>Person ID</b>	1152837
<b>Full Name</b>	Suzanne Jannese
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Please see answers below - my specific objection is to building works on the proposed Bank Mill Lane site.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8069
<b>Person ID</b>	1266048
<b>Full Name</b>	RACHEL MORGAN
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8075
<b>Person ID</b>	1266049
<b>Full Name</b>	Mike Plowman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.</p>

In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!

In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.

The Council's proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8148

**Person ID**

1266090

**Full Name**

Amy and Andrew Cooper

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

We, Amy Cooper and Andrew Cooper, strongly disagree with 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth is obviously too much for the town. With circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, this equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint (Google Earth used for calculations), most of which is located within sensitive ridge top locations in Green Belt.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8214

<b>Person ID</b>	1266154
<b>Full Name</b>	Iain Smith
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Section (3): Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon S neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. You have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.</p> <p><b>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.</b></p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8237
<b>Person ID</b>	1266155
<b>Full Name</b>	Annabel Carroll
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8306
<b>Person ID</b>	1266175
<b>Full Name</b>	Anna Foster
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>No I do not. I think the numbers of houses being proposed in market towns is far too high, this will change the face of in particular Berkhamsted, Northchurch and Tring completely, for the worse. I believe that the housing numbers being used by DBC are incorrect – the need is being overstated. To increase small market towns by as much as you’re proposing is not right – the South West Herts Local Housing Needs Assessment Final Report - September 2020 a study by G.L. Hearn and covers neighbouring councils such as St.Albans as well as Dacorum, says on page 5: “Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth.”. As the CPRE say, this plan would cause ‘irreparable harm to the environment’. Why would we do this???</p> <p>I do not dismiss the need for housing, but people need houses they can afford, not what the council and/or developers deem to be ‘affordable’, and I do not believe this will be the case with this plan. Building executive homes only draws people in from London and doesn’t help local people. For example, I haven’t seen any evidence that the new homes at Bearoc Park have enabled young Berkhamsted families / couples / singles to buy their first home – because they are huge, executive, and prohibitively expensive. SO this doesn’t help the people of Dacorum, whom you serve.</p>

I believe the plan doesn't make the most of recent changes due to the pandemic – I don't believe that retail and office spaces / sites have been investigated enough, to see if they could be changed to housing. With the huge reduction in the need for offices etc due to home working, I would think this would be sensible.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8321

**Person ID**

1207813

**Full Name**

Graham Hale

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

Why do I have to register to make a response ?

Is this a bureaucracy wall to prevent comment? Is it comment suppression ?

Here are my comments anyway. Please register me and ad my comments to my registration.

**General comments.**

Developments like this make the South East ever more overcrowded and unhappy place to live.

The government should follow a strategic plan of building new housing and industry in the north.

A new town could easily be built in Yorkshire around the east coast main line and M1/A1 near Selby where communications and land are plentiful.

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**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8409

**Person ID**

1266234

**Full Name**

LUCY DUGDALE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

> —No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.

> —Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.

> — We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8444

**Person ID**

1266276

**Full Name**

BARBARA ANSCOMBE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8467

**Person ID**

495878

**Full Name**

Ms Anna Hanson

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>This area is protected by greenbelt. Many residents have chosen to live here based on the small town nature and countryside. In recent years we have already seen a huge increase in new build housing. increasing the population changes the nature and character of the town, and for long time residents, compromises our enjoyment of our homelife.</p> <p>The town's infrastructure is creaking, the traffic on the high street and high traffic areas such as Charles street is untenable (outside lockdown of course). If I get into my car on a weekday during rush hour, I'm sat stationary outside my house for a long time. It is often quicker to walk down the high street than drive. The air quality is significantly impacted in the town centre and residential areas as a result.</p> <p>if I ever need to collect my children from school at 4.30pm, it takes 20 mins to drive back down the high street to get home. Yet it only takes 6 mins to do that drive normally.</p> <p>More traffic will make the high street - one of the main attractions for many - considerably less pleasant. Building on the outskirts will mean new residents will need to drive into town.</p> <p>The logistics of managing traffic in the town are limited by the canal, river and railway. The secondary school is already oversubscribed.</p> <p>I'm not at all confident in the data that has been used to determine housing targets.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8478
<b>Person ID</b>	1266302
<b>Full Name</b>	Gareth Garner
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	<ol style="list-style-type: none"> <li>1 There is an over-provision of housing based on inaccurate and superseded The plans are based on out of date ONS data so the yearly targets for associated housing development are significantly too high.</li> <li>2 Dacorum Borough Council has declared a climate emergency and indicated that this should be central to any future plans for the This local plan does not do that, but prioritises economic growth and greenfield land development over considerations for the climate. It doesn't take account of legislation and recommendations from various UK bodies on carbon reduction.</li> <li>3 The plan does not protect Green Belt It should guarantee the protection of existing natural habitats.</li> <li>4 There is not a sufficient plan for infrastructure and employment growth to support the number of dwellings being proposed</li> </ol>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8491
<b>Person ID</b>	1266311
<b>Full Name</b>	Dr Gwynneth Down
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>In this document I am replying personally as a resident of Tring, and will draw on a combination of my own responses to the Draft Local Plan, as well as endorsing and using some responses from Tring in Transition, The Grove Fields Residents Association, CPRE and Dacorum Green Party.</p> <p>The overarching vision and strategic objectives seem positive and useful but do not match the proposed actions or level of detail within the document. I find that the words used (e.g. 'to protect and enhance natural beauty and varied character of the countryside' or to 'provide environmentally sustainable growth' ) are just words which are not supported in the actual development plan.</p> <p>For example, the proposal for increased housing in Tring and use of Green Belt land appears to directly go against the principles of a) conserving and protecting the natural environment, b) mitigating and adapting to climate change and c) promoting the distinctiveness of towns and villages, and d) protecting and enhancing Dacorum's distinctive historic environment.</p>

The housing allocation set for Dacorum is unreasonably high. The Local Plan 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. This growth in household numbers is a 25% increase over the current housing stock. 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 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 therefore demonstrate evidence for objectively assessed need.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8510

**Person ID**

1265044

**Full Name**

Joseph Price

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

Elements of the vision, regarding protecting the environment, and sustainable development, I am in broad agreement with. Which is why I find the nature of the plans, specifically for Tring, so absolutely disgraceful. To be irrevocably destroying huge swathes of Green Belt land is totally unacceptable from an environmental stand point. Not only that, but in destroying this Green Belt land, the proposals will also permanently alter the nature of Tring as a small market town - the Tring that we know will be dead. Population doubled? On Green Belt land? Putting a medium/large size supermarket in the Forge Road car park? This is almost unbelievable, and in years to come, with the climate crisis and sustainability only growing in prominence, these proposals will seem more and more egregious and poorly thought out.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8540

**Person ID**

211354

<b>Full Name</b>	Mrs Laura Sanderson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I do not.</p> <p>The removal of Green Belt protection around Berkhamsted and Tring is appalling. Shame on you. You are wanting to make Berkhamsted into another ugly Hemel Hempstead with no regard for its historical importance, character and natural surroundings. You do not have the best interests of Berkhamsted's residents at heart, nor of Berkhamsted's countryside. The Government has stated clear support for the Green Belt - why has DBC decided that it is of no importance to them? The residents of Berkhamsted and many other places have appreciated the countryside like never before during this last year - how can you remove it from people because you refuse to regenerate town centres. There will be many buildings left empty in town centres as businesses leave - focus on those.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8567
<b>Person ID</b>	1266567
<b>Full Name</b>	CAROLINE SMALES
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The</p>

Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.

Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable. In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!

In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.

The Council's proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8600
<b>Person ID</b>	1207775
<b>Full Name</b>	Heather & John Ebdon
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p><b>2.3 et seq Housing Growth</b></p> <p>The entire Plan is founded on a misconceived driver for housing expansion. Whilst no one is against a level of growth to provide for the Borough citizens, the determinate of the housing need is a reliance on a failed algorithm driving numbers of new houses said to be required from the 400/500 per year currently being delivered to around 1000 per year. The algorithm is explicitly based on the 2014 ONS data, not the more recent 2018 ONS projections; in any event all this data and projections will be overtaken by the figures flowing from the March 2021 Census which by definition will be the most up to date and comprehensive. Once the true numbers are available the Plan should be amended to reflect the real state of affairs.</p>

The entire Plan was drafted before and obviously barely cognisant of the emerging and permanent impacts of the Covid 19 pandemic - see 2.26. These impacts include a retreat from traditional shopping outlets and the increased acceptance of working from home and the reduction in commuting needs. There is a sound argument for pausing the Plan whilst these emerging impacts settle and fundamentally reappraising the way forward. If retail retreats, then land near the centres of the Borough's towns will be under-utilised and become viable for residential development. The retreat from a "five day commute" will place less pressure on the Borough to accommodate those fleeing from London but seeking quick daily access back for work – if the number of journeys per week is curtailed, a longer commute becomes acceptable and the London refugee pressure spreads over a wider area.

It has also to be said that even as currently drafted, the Local Plan pays only lip service to responding to the climate emergency (a unanimously endorsed goal of the Borough Council) and increased abstraction of water from the chalk aquifer to service a growing population. It also pointedly ignores the decision of the West Herts Hospitals NHS Trust to deliver the main component of the Borough's acute hospital needs from its site at Watford. Neither does it recognise, let alone respect, the high proportion of land within the Borough that is Green Belt or AONB and makes Dacorum a fine place to live..

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8615
<b>Person ID</b>	1266595
<b>Full Name</b>	SHARON MACARTHUR-POWELL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8625
<b>Person ID</b>	1266604
<b>Full Name</b>	SEB BELOE
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>1/ Do you think the overarching vision and strategic objectives are right for the Borough?</p> <p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8637
<b>Person ID</b>	1266607
<b>Full Name</b>	RACHEL POWELL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8655
<b>Person ID</b>	1248896
<b>Full Name</b>	Ashleigh Genco
<b>Organisation</b>	Harrow Estates plc
<b>Agent ID</b>	1258542
<b>Agent Full Name</b>	Samantha Ryan
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Harrow Estates plc (Harrow) supports the over-arching vision of the plan which sees the borough building on its strengths and opportunities to deliver balanced communities with the homes, jobs and supporting infrastructure required; ensuring that Dacorum remains an attractive and desirable home for residents and businesses. This requires careful balancing of a wide range of issues and challenges to, inter alia:</p> <ul style="list-style-type: none"> <li>- deliver a step change in housing growth to meet the target number*, type and location of new homes required in the borough; ensuring that the right type of housing is provided in the right location, and at the right time to meet the changing housing needs of all members of the borough's communities.</li> <li>- address the effects of climate change and embrace the opportunity that new development offers to deliver significant and meaningful measures to combat the effects of the climate change emergency.</li> <li>- encourage new residential uses to help sustain and enhance the borough's town centres over the longer term.</li> <li>- support a modal shift towards more sustainable travel modes that facilitate the increased use of public transport, cycles and movement on foot and support for low / non-carbon vehicles</li> </ul>

- integrate the provision of new infrastructure alongside development
- minimise the impacts of growth on the natural environment, in particular the Chilterns Beechwoods SAC by ensuring that new development links to existing green networks, and creates new and varied green spaces, promoting opportunities for biodiversity and nature conservation.

\*Harrow notes that the Growth Plan has been prepared on the basis of a housing target of 922 dwellings / annum which was the figure available at the time of publication. The housing target has subsequently been increased to 1022 dwellings / annum presenting further challenges for the plan to ensure that the borough's housing needs are met (see also response to Question 8).

Harrow agrees that it is important, and in accordance with national planning policy, to plan for development in the most sustainable locations, ensuring that the needs of all of the borough's residents are met. Accordingly, the company supports the council's strategy to ensure that each of the larger settlements, including Tring which is described in the plan as "one of the most sustainable settlements in the borough" (paragraph 23.138), should play a greater role in delivering balanced growth to meet the development needs of Dacorum (paragraph 2.24) and the key priorities identified through the Corporate Plan (paragraph 3.5).

The Council's own significant body of evidence demonstrates that the development required cannot all be met within the existing urban area and that expansion of the main settlements is required to deliver the Vision and Strategic Objectives; this is entirely in accordance with national guidance at paragraph 72 of NPPF. Accordingly, Harrow strongly supports the specific vision for Tring, in particular the aim to deliver a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape and protected environmental sites (paragraph 23.140). Harrow's support is further articulated in a Vision Document accompanying these representations which includes an illustrative masterplan showing how the development of a new garden suburb east of Tring ('Marshcroft') can provide a sustainable expansion of the town that:

- integrates with Tring to meet the needs and aspirations of existing and future residents and businesses of the town
- delivers high quality homes, community, transport, social and well-being infrastructure as part of an integrated and comprehensive development set within an extensive green and blue infrastructure network
- creates opportunities for travel by non-car modes, including improved links from the town to Tring Station
- provides an extensive open space network, uniquely including Suitable Alternative Natural Green Space (SANGS) to mitigate the recreational impacts of the development, bio-diversity net gain, and compensatory improvements to land retained with the Green Belt.

<b>Included files</b>	<a href="#">Harrow Estates - Agent Sam Ryan - Ryan and May - 210215 Correspondence to LPA to accompany representations.pdf</a>
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8666
<b>Person ID</b>	1207333
<b>Full Name</b>	Growth Team

<b>Organisation</b>	Growth team Hertfordshire County Council
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><u>Transport</u>. The county council would welcome more detail, explanation and recognition that a move towards sustainable transport is the approach the Local Planning Authority (LPA) supports to mitigate the impact of growth (along with many other factors). The plan should clearly set out the view and ambition of the LPA at an early stage and follow through with that in terms of broad and specific</p> <p>Throughout the whole plan, HCC would welcome a review of the phrasing and approach when discussing transport, as the draft plan creates a general assumption that private vehicle trips are the only modes being</p> <p><b>Climate Change Emergency (paragraph 2.2)</b></p> <p><u>Lead Local Flood Authority</u>. more flooding is highlighted as a consequence of more extreme weather events which are predicted to occur as part of climate It is also highlighted that planned growth offers real opportunities to deliver significant and meaningful measures to combat the effects of the climate change emergency this needs to be reflected more strongly throughout the document. It is noted that adaptation to climate change and management of flooding are included as points in the summary tables on pages 25.</p> <p><b>Transport and Movement (paragraph 2.13)</b></p> <p><u>Transport</u>. With regard to the peak period congestion problems that are mentioned within this paragraph it is not just car ownership, but continuing high car use, especially for short trips, that result in the problems that the borough (and all of Herts/UK) face in transport A main reason for this is prioritising, designing and planning for private cars for the last sixty years with minimal walking, cycling or public transport consideration. The new plan must seek to assist HCC in rebalancing the provision of the highway network, so it is efficient, accessible and attractive to make those short journeys by sustainable means.</p> <p>The references to passenger transport, walking and cycling is the first real introduction to transport in the draft plan and it is felt that the LPA should clearly set out its position on how transport needs to develop over the planned period. HCC's view is that to maintain the level of mobility required for the borough is a significant modal shift to sustainable transport</p> <p><b>Paragraph 2.14</b></p> <p><u>Transport</u>. It is suggested that the following wording is amended, to ensure that all new development includes high quality connections for walking, cycling and public transport services:</p>

*“Our residents have told us of their concerns over the ability of the roads to accommodate high levels of housing growth and to tackle climate change we need to significantly reduce harmful emissions and particulates from transport and at the same time greatly improve local air quality. Therefore, new development will need to be located in places which have excellent access to jobs, shops, services, can quickly and easily be reached by sustainable public transport and benefit from high quality connections for walking, and cycling infrastructure and passenger transport services and have sustainable transport as a demonstrable aspect of their design.”*

The phrasing within paragraph the remainder of 2.14 should also be reviewed, if this is in the context of what is known to support the uptake of sustainable modes when considering routes, it should therefore highlight that direct, safe and accessible for the entirety of the journey is emphasised. Journey length should be considered as a separate point in the design of new development, which should provide shops/services/amenities locally to reduce the need to

### **Paragraph 2.15**

Transport. The development of detailed Sustainable Transport Plans is welcomed, although a timeframe for this work should clearly be stated, as real change will be needed before the end of the plan period and measures to begin this will be required in the short term. New developments also provide an opportunity to start delivering low carbon transport g. electric vehicle charging points being included as standard, opportunities for car clubs with EVs and bike share schemes with electric bikes.

### **Paragraph 2.16**

Transport. The text within this paragraph may simply push the delivery of sustainable transport measures further away. The traditional approach of predict and provide for transport will no longer work in supporting growth in the borough, we now must actively decide which transport modes best meet the needs of communities and allow sustainable trips to be real options, not relying on each resident of the borough to own a car to travel. There is a requirement for Dacorum to commit to act to address and deliver behavioural change with regard to transport movements (please see comments in the IDP section of our response for our overall position).

There is a requirement for the LPA to commit to act to address and deliver behavioural The sustainable transport plans should also include measures such as promotion, marketing and travel planning initiatives to help change the current ‘car first’ mindset.

### **Covid-19 Recovery**

Public Health. It should be noted that the county council has seen a significant change in emphasis on the role of places and their contribution to their impact on health coming out of the COVID19 pandemic, particularly around health inequalities, access to quality open space, active travel and housing design Therefore, it is felt that this section of the draft plan could be even more explicit on the crucial role of planning as the borough moves into recovery from the pandemic.

The graphic on p.20 whilst referencing some health evidence, could be more robust by identifying some of the key challenges for the borough that good planning and development of great places can address (e.g. obesity, preventable early deaths and health inequalities). All of this information is available online via either the Public Health Outcomes Framework (which has recently been updated) or the Herts Health Evidence More local health evidence here would link

well into: 'Theme 3: A happier, healthier and safer Dacorum' on p.21 and would also provide the rationale for the health and wellbeing text in the overarching vision for the borough.

### **SECTION 3: BOROUGH VISION TO 2038**

#### **Overarching Vision for Dacorum's Growth by 2038**

Public Health. The county council supports references to, and the inclusion of health and wellbeing within the overall vision for the However, the plan needs to mention health inequalities, as this is a challenge for the borough. For example, there will be a significant difference in health outcomes between the communities in Hemel Hempstead and Berkhamsted. Mentioning this in the plan's vision, will provide the 'golden thread' from the vision and strategic outcomes desired to link into and support the later policy for Health Impact Assessment.

#### **Environmental Sustainability**

Transport. This section of the plan's vision is supported and the inclusion of 'active travel' is also welcomed when describing walking and cycling. The county council would also support an explanation of this being for all trips, be that for work, leisure, shopping etc. This aligns with the health and wellbeing section of the It is considered that the LPA should also be committing at this stage to deliver these measures and approach through their own assets and opportunities.

The statement: "...by having facilitated a significant increase in sustainable travel modes..." is supported, although a fundamental shift away from car trips to sustainable modes is needed, known as positive modal shift. LTP4 fundamentally prioritises reducing the need to travel, be that from a home, new development or whole settlement, by designing and providing services, facilities and destinations in the right place to achieve internalisation and maximising development opportunities in those locations which already have services and facilities. The inclusion of 'Active Travel' within the vision is welcomed.

The third paragraph should be re-worded as follows:

*"Sustainable transport will be a real option as public transport has become more reliable, rapid, flexible, convenient and widely used. Places are better connected, and there are greater opportunities to walk and cycle.*

*Dacorum will have in place a network of cycle lanes and secure bike parks, that have encouraged greater levels of cycling and walking, while also having promoted the use of public and greener transport. Green infrastructure should also be provided, in order to provide cycling and walking routes that would align to Hemel Garden Community aspirations."*

#### **The Vision for Dacorum's Places-Hemel Hempstead**

Transport. The county council would like to see priority given to sustainable transport improvements in Hemel Hempstead such as walking, cycling and public transport to provide connections within and surrounding Hemel Hempstead which will create the potential for a significant modal shift away from private car use towards these sustainable modes of transport. The text should be amended accordingly to reflect

In relation to new link roads connecting the existing highway network, HCC would like to see consideration given first to 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 is required. More details on this will be available once the Hemel Garden Communities transport strategy (Stage 2) has been

*The sixth bullet point therefore needs to be updated accordingly to reflect this as follows:*

*have had significant transport improvements across the town including new sustainable transport corridors linking key destinations across the town, along with improvements to enable the introduction of a potential east west Mass Rapid Transit system with new link roads connecting the existing highway network and making provision for alternative routes linking key destinations across the town;*

#### **The Vision for Dacorum's Places-Berkhamsted**

Transport. The county council welcomes the inclusion of transport in the vision for Berkhamsted. However, there should also be a recognition of the need to improve sustainable transport links to adjoining towns such as Tring and Hemel Hempstead.

#### **The Vision for Dacorum's Places-Tring**

Transport. The county council welcomes the inclusion of transport in the vision for Tring. However, it is suggested an improvement in sustainable transport links to adjoining towns (Aylesbury, Berkhamsted and Hemel) should be mentioned and the following text should be added at the end of the third bullet point:

*have provided significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town and to the railway station;*

#### **The Vision for Dacorum's Places-Bovingdon, Kings Langley and Markyate**

Transport. The county council will welcome the inclusion of sustainable transport improvements in these villages vision, notably walking and cycling within each settlement, but also the sustainable connectivity to adjacent

#### **The Vision for Dacorum's Places-The Countryside and other small villages**

Transport. The county council will welcome the inclusion here that the countryside will support intra settlement sustainable travel through the use of existing and new public highway, rights of way and green

#### **Included files**

#### **Consultation Point**

Borough Vision to 2038

#### **Comment ID**

EGS8682

#### **Person ID**

1266684

#### **Full Name**

Mr Paul Orchard-Lisle

#### **Organisation**

#### **Agent ID**

#### **Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	While some limited expansion of housing provision should be permitted, I consider that the main towns for growth should be those further removed from the very congested towns in SE England.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8790
<b>Person ID</b>	1261814
<b>Full Name</b>	Liz Uttley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The Strategic Planning team have put together a thorough plan, which had to take into account the competing needs of a growing population and climate change. However, due to our rapidly changing society it would appear that these needs have been misprioritised.</p> <p>The vision for the borough currently includes plans for a larger number of new dwellings than is actually likely to be required. This is in part because of the shortage of affordable housing across the country, the government solution for which is to 'build, build, build'. Whilst I do not consider that housing affordability can be tackled by simply oversupplying housing, particularly by releasing large areas to developers in the commuter belt. In any case, without legislation to encourage it, developers will simply not provide any oversupply of housing which could affect their profits. At present, there are around 1 million homes with planning permission which have yet to be built across the country.</p> <p>The latest data suggests that only 355 new homes will be needed in Dacorum per year over the next ten years, which even with the uplift from the standard method gives half what is proposed in the plan. The false need figure of 922 dwellings per year forms the basis of the entire plan. I am concerned that the result will be a lot more executive housing to tempt people out of London, but not sufficient social or genuinely affordable homes. If, as is suspected, these homes are not required, we will find ourselves in a situation where developers with planning permission do not want to build</p>

every home. The developers will instead build only the most lucrative properties, and this will lead to our green belt being built upon, and our brown field locations left unrenewed. It will also further add to the inequality between north and south, with homes within commuting distance to London selling for significantly higher prices than the same homes elsewhere. The result will be that homes will be built on London commuter belt green belt in preference to elsewhere, with the rest of the country falling behind.

On top of this the carbon impact of removing land from greenbelt has not been considered, and given the net zero targets of the council (2030) and the UK government (2050) this is a major factor which needs to be calculated in ascertaining how to get to net zero.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8805

**Person ID**

1158356

**Full Name**

Colin Blundel

**Organisation**

Planning Officer  
Chiltern Society

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Overall Approach

The Chiltern Society is an environmental charity with 7000 members, which seeks to protect the landscape and biodiversity of the Chilterns, including the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Part of the Society's remit is to input to the planning system in relation to planning policy and local planning applications. This response has been prepared by the Society's Planning Officer with detailed input from our Planning Field Officers working in Dacorum Borough.

We have been working with other local organisations in an alliance called 'One Voice' to agree a shared approach to opposing the Dacorum Local Plan. We have agreed, and now endorse, the following 3 statements in relation to the Emerging Strategy for Growth as a whole -

"We the Chiltern Society, Chiltern Countryside Group, Grove Fields Residents Association (GFRA), Berkhamsted Residents Action Group (BRAG), Kings Langley & District Residents Association (KL&DRA), Berkhamsted Citizens 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."

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8807
<b>Person ID</b>	1158356
<b>Full Name</b>	Colin Blundel
<b>Organisation</b>	Planning Officer Chiltern Society
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The Society held an online consultation event on 14th January 2021 to gauge the views of members and other partner organisations concerning the Local Plan. There was a broad consensus that the Plan was not a suitable Plan to steer the future of Dacorum as it proposed too much development and insufficient environmental safeguards.  We would like to make some general comments here, as well as specific comments on sections of the Plan.

## General Comments

The Society objects to the strategy proposed in the Plan as it proposes an excessive number of new houses across the Borough and presents a significant threat to the Green Belt and the setting of the Chilterns AONB.

The issuing of the Plan is totally premature given the current health crisis, giving rise to limited public consultation. Previous Plans involved public exhibitions and leaflet drops to ALL households in the Borough. This consultation relies on the internet. Not every household has access to the internet which disenfranchises a large section of the population which is clearly undemocratic.

DBC gives little consideration to the effect of this massive amount of development on the existing settlements which will suffer from increase in traffic, loss of open space and pressure on facilities. Infrastructure within the Borough (eg roads, education, health care etc.) is already under considerable pressure from the existing population and increasing it by around 30% will put further excessive pressure on these. Whilst developers may be required to contribute towards infrastructure, this may not be sufficient to meet the needs of this vastly increased population and concentrates benefits on the new developments. It's all about development with little attention paid to its effects and little on mitigating the damage.

There are already outside pressures on the infrastructure such as the proposed expansion of Luton and Heathrow airports with the consequential increase in traffic, noise, pollution, the loss of Hemel Hospital with Watford being difficult to access at times and struggling to cope at present (even pre Covid), massive expansion of Aylesbury which will impact on availability of facilities, especially health and education, for those in the west of the Borough and the expansion of St Albans with possible development adjacent to Dacorum's boundary.

It is also dependent on the release of vast tracts of Green Belt land. The three main towns in the Borough are surrounded by Green Belt the loss of which will be detrimental to not only the residents of the towns but by others working and visiting the area. The reason people want to live in Dacorum is not just its proximity to London and its facilities, but because of its setting in the countryside.

We recognise that development, especially housing, is needed. However, the current plan proposes 15,658 additional dwellings based on flawed and outdated calculations of housing need. The Government is currently revisiting the numbers and distribution of housing numbers and therefore the Plan should be suspended until such decisions are made. As submitted the Plan is NOT SOUND. The Council appears to be intent on providing at least 100% of their self-assessed figures regardless of the impact. Revised figures may have a material impact on the requirements for the Borough requiring less development and consequently the release of large tracts of Green Belt can be avoided. The Council should be arguing against these numbers and not just 'roll over' and accept them. This may not be what the Council wants to do as it may fear the loss of substantial income!

There are 59,938 households in the borough at present, with 16,899 new ones planned in just 17 years. That's a 28% increase in a Borough that is highly constrained by Green Belt and AONB. It is unclear from the Plan whether the Council will be taking into account the recent Government announcements to revise their housing targets, preferably downwards, to protect rural areas in the south east, as reported by the BBC on 16th December 2020. Initial indications that we are getting are that the number may actually increase further. This goes against Government announcements about 'levelling

up' and encouraging more development in cities in the north of England. This does not make any sense in a Borough as constrained as Dacorum.

Looking at the population statistics of 155000, an increase of nearly 52000 based on 17500 new dwellings means a population uplift of around 30%. Most of this build will be on green belt and in close proximity to the Chilterns AONB.

There is already substantial build agreed and with the proposed numbers the Borough will become urban rather than rural in nature. As most of this new build is on Green Belt, any requirement to replace Green Belt will use up the rural area and maybe the AONB.

The Plan is outdated in approach and assessment. It should start with an integrated approach including climate change, biodiversity, protection of the environment and the well-being of existing and new residents. This Plan prioritises economic growth and greenfield development at all costs.

Covid-19 has changed the face of how we work, shop, play and travel. Have those responsible for the plan thought how they will take this into account, and when they will amend these plans accordingly? Because of COVID-19 the AONB has seen a sharp rise in visits by people seeking open space and outdoor amenity, and colleagues have heard complaints from friends and neighbours trying to access both Ashridge and Wendover Woods about the sheer volume of cars and people making it impossible to visit and park.

Access to open land is clearly a health issue. The Government and the Mayor of London publicly support the protection of the Green Belt, described as 'London's lung'. The current health crisis has emphasised the importance of open space for health and recreation. The popularity of the area has been seen in recent months with the influx of visitors seeking fresh air and recreation during the pandemic. Given more normal times this would have been a boost for the local economy and will do so again when other facilities become available again. This income will be lost with the land developed. The beautiful, green and tranquil open landscape with its historic field patterns and ancient woodlands cannot be adequately replaced by the so called 'Suitable Alternative Natural Greenspaces' (SANGS) ie. manufactured open space. Why build on natural open space merely to replace some (only very limited) man-made green space. The wildlife will disappear as their habitat is destroyed.

Due to the pandemic, the collapse of the retail sector, and the new situation of many people working from home, there will be a glut of commercial properties which can be converted into residences. This is already being planned by John Lewis.

The devastation of the Green Belt around Tring, Berkhamsted and Hemel Hempstead, abutting the Chilterns Area of Outstanding Natural Beauty (AONB), is significant, in reality it is unclear what the Council will do to mitigate this. Regardless of previous actions the region's biodiversity has suffered as much if not more than any other non-metropolitan region of the UK, and indeed possibly the whole of Western Europe.

The Green Belt around the three main towns currently fulfils the 5 functions of the Green Belt. These functions have not become unnecessary and the general presumption against development in the Green Belt as set out in the NPPF is still relevant. The Council has ignored para 11 (6) which allows local authorities to restrict the scale of development due to other planning constraints including impact on the Green Belt and AONB. No exceptional circumstances have been

demonstrated to justify such a vast loss - their desire to meet their calculation of housing numbers is NOT an exceptional circumstance.

One third of the countryside area in Dacorum is Chilterns AONB - surely a lot more emphasis must be made on its importance and protection. No mention is made of the possibility of the CAONB becoming a National Park - has Dacorum heard of the Glover Report or the Government's 'Ten Point Plan for a Green Industrial Revolution', which include the creation of new National Parks? Again, an indication of a poor Plan!

As well as the obvious environmental impact, there will be physical and visual impacts on the AONB. Once the additional local residents and their vehicles are added to this then there will be serious management issues for the AONB, which as we are well aware is not a National Park, although the Chiltern Society hopes that designation may happen in future. What guarantees can the Council and government give that this unique landscape will be protected and maintained for the future?

Most of the build will be to the north and east of Hemel Hempstead (11688), Berkhamsted (2230) and Tring (2730). Most of the areas are in Green Belt and close to the AONB, and the impact on these towns needs to be considered. Little recognition seems to have been taken of the topography, we are basically talking about a series of valleys and therefore any development on the slopes is going to have a visual impact for many miles.

We note that the Government's February 2021 consultation on changes to the National Planning Policy Framework is proposing to add a specific reference to the impact on the settings of AONBs into the existing AONB paragraph 172.

The landscape and visual impact of the proposed housing developments is likely to be significant around the urban areas of Hemel Hempstead, Berkhamsted and Tring.

A new link road is proposed east to west in north Hemel, so traffic issues and noise, visual impact etc. are inevitable. The whole character of the Borough will be changed, the small market town of Tring is expected to absorb what is a 20% increase in residents, bolting a new "village" onto it.

Berkhamsted is a historic and larger market town with a proposed increase of around 30% on top of the big Bearroc phase 1 and 2 developments generating over 200 new houses, and already creating traffic issues along Durrants Lane and Shootersway. A 2 bed semi costs in excess of £450k, hardly affordable housing.

This has become a very desirable commuter town over the last few years, but will this still be the case after Covid with numbers moving out of London and a lot less commuting/more home working? What effect will all this have?

Whilst there are commendable targets for the Council to be carbon neutral by 2030 (not the region, just the Council), and an aim for a biodiversity net gain of 10%, we are not convinced the Plan would do enough to combat either Climate Change or Biodiversity loss.

We would like to see the Council supporting the Society's Manifesto for Chilterns Wildlife (<https://chilternsociety.org.uk/chiltern-manifesto/>) and proposals for a 'Wild Belt' in the Tring and Wendover area to support this. If development is to be allowed, then strategic biodiversity enhancements and net gain must be incorporated and managed in the long term.

We are already exceeding the environmental boundaries our region can cope with and see nothing real in this plan to change that. We need to know what is being done differently to ensure a real biodiversity net gain, and to combat climate change other than the 'business as normal' plan that this appears to be. The time to act on this is now.

### Specific Comments

2.1 - Opportunities and Challenges for Growth – This needs to include a reference to habitat loss and making a significant contribution to habitat recovery.

2.2 - Climate Change Emergency – The Council needs to commit to improving the resilience of the local environment to climate change.

2.19 – 2.20 - The Natural Environment section needs to stress the national importance of the Chilterns, including it potentially being designated as a National Park following the Glover Review 2019.

The Plan should also commit to a step change in the restoration, enhancement and creation of wildlife habitats across the Borough to reverse biodiversity decline, whilst ensuring the local environment is resilient to climate change.

The loss of agricultural land is particularly relevant given that having left the EU the government is promoting home grown food. The excessive loss of large tracts of good quality agricultural land is contrary to this aim.

There is no indication how it is intended to reduce local carbon emissions in order to meet the national climate obligations of zero by 2050. Planting a few trees is not enough.

The Plan treats the three main towns in the same way - just build around the edges. This takes development further away from facilities further exacerbating the use of cars which undermines sustainability and the effect on climate change. No regard is taken of the topography of Hemel Hempstead and Berkhamsted lying within the valley floors. Thus, any development at the edges is on the ridges and not only will this have severe visual impact on the surrounding countryside which is within the CAONB but makes journeys to the facilities more difficult and does not encourage walking/cycling.

2.24 – This section needs to include a clear statement about protection of the Green Belt and the Chilterns AONB. Commitment to protect the wider countryside 'as far as possible' does not give this matter the priority it deserves. Habitat loss across the country has been accelerating in recent years and the Council must commit to work with local and national environmental organisations to set some ambitious targets for large scale improvements and not overseeing a managed decline over the plan period.

Whilst the proposed developments are not actually in the CAONB, the effect of them will have a devastating effect on the CAONB. The Green Belt and the AONB are intrinsically interwoven, thus diminishing the Green Belt which diminishes the AONB. The introduction of significant and abrupt changes to landscape character (especially where the land is currently of similar character to the AONB) will be detrimental to the whole landscape character, loss of biodiversity, impacts on character and appearance of rural roads and lanes, increase in air and water pollution and of course a detrimental effect on the existing settlements and inhabitants. Very large developments like those proposed will have an impact even if they are some distance from the actual AONB boundary. There will be severe effects on views out of the AONB and views of the AONB. There will be a loss of tranquillity from lighting, noise, traffic movements.

3.3 – The six over-arching themes need to sound much more ambitious. In particular Theme 4 lacks any ambition to make real improvements to the landscapes and biodiversity of the Borough. Clean, green and attractive areas are important, but there should be an ambition to encourage landscape-scale conservation and reconnect wildlife habitats across the Borough and linking into adjacent districts.

Overarching Vision – The Chiltern Society is disappointed with this vision. It appears to advocate ‘more of the same’ rather than setting out a new vision for the area. With significant changes to priorities and attitudes arising as a result of Covid-19, climate change, biodiversity loss and sustainable transport, there is a need for a much more ambitious vision. The proposed level of housing is excessive, in our opinion, but if it is to go ahead the Plan needs to include equally ambitious proposals in these other key areas. There need to be specific strong commitments to maintaining and enhancing the Green Belt and the Chilterns AONB (or National Park) in the long term to maximise their benefits to the local environment and enhancing people’s lives. It is not acceptable to simply allow major housing development and create urban green space to compensate for the loss of open countryside. The Plan must maximise biodiversity net gain and should consider Nature Recovery Networks to act as focal points for significant wildlife enhancements.

In relation to the Chilterns Beechwoods SAC, no impact should be permitted as a result of new development. It is not acceptable to allow impacts and then seek to mitigate them. The vision needs to be more definitive and not take an ‘as far as possible’ approach to protecting the local environment.

The Vision for Dacorum’s Places – As for the overarching vision, these sections could be presented in a more inspiring way. They come across as a ‘business as usual’ list of aspirations without presenting any significant changes of approach. It would be clearer to have a succinct vision statement for each settlement, which could then be supported by a number of bullet points. It is essential that the reader can gain an immediate idea of the long-term vision for each settlement without necessarily having to read through all the bullet points.

Each of the local visions need to include clear aspirations for protecting and enhancing the local environment, including designated landscapes and significant biodiversity net gain, including nature recovery networks. It is not sufficient to ‘take into account’ sensitive views, landscapes and protected environmental sites. These need to be protected and enhanced through the creation of buffer zones and establishing habitat links between isolated wildlife sites. It needs to be a positive vision for the future.

Strategic Objectives – We support the proposed objectives for Conserving and Protecting the Natural Environment. The Council could, however, go further, as suggested above, and take a more proactive approach to habitats creation and enhancement. The Society’s Manifesto for Chilterns Wildlife seeks to take a strategic approach across the Chilterns and could be incorporated into the objectives for the Local Plan. <https://chilternsociety.org.uk/chiltern-manifesto/> The conservation of the internationally important chalk streams, woodlands and grasslands are key parts of this.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS8869

<b>Person ID</b>	1266814
<b>Full Name</b>	Eric Juster
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>Please note my objections to the Hemel local plan, especially the development proposed next to grove hill which will ruin lively hoods of local farmers and destroy footpaths and bridle paths which are essential to locals happiness and the environment</p> <p>I do not agree that 16,000 houses should be in the plan and you should be using the latest figures which would halve that number to around 8,000 houses at a maximum.</p> <p>This pandemic has shown how important our local green spaces are and that our green belt land must be protected.</p> <p>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 and prevents them merging into one another.</p> <p>Your plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home.</p> <p>Your plan does little to address the improvements on infrastructure that will be needed to support that many new houses.</p> <p>I have heard we don't have enough water to supply all the extra houses. It is a fact 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8959
<b>Person ID</b>	222676
<b>Full Name</b>	Mrs Carolyn Hill
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I am horrified by the proposals which go against all established national regulations for building on green belt. I concur with the response of both BRAG and Berkhamsted Citizens Association who have responded with detailed challenges to the assumptions DBC make in the draft plan. I strongly disagree with 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth is not sustainable and will destroy special areas of biodiversity which should be protected. . With c. 500 dwellings planned in Northchurch Parish and around 1700 in Berkhamsted, this equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint, most of which is located within sensitive ridge top locations in Green Belt. 2 We note that the 2013 Core Strategy vision of "maintaining the strong valley and linear character of the settlement" has now been ignored. Where previously the Council asserted that "The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported" (and put this argument strongly to the Planning Inspector), DBC now promote the land for removal from Green Belt and suggests that development can now be built "in a way that takes account of sensitive views and landscape". The plan removes green belt areas that have become and are becoming increasingly popular walking/rambling routes and provide easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS8963
<b>Person ID</b>	1266893
<b>Full Name</b>	PENNY HARRISON
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Comment</b>	We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9059
<b>Person ID</b>	1267065
<b>Full Name</b>	M BALAC
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I am writing to object to the New Dacorum Local Plan.</p> <p>As a local Markyate resident I am deeply concerned and troubled by the expansion plans and the detrimental and long term damaging effect it will have on our precious green belt areas and environment. The development of housing on brown sites I understand is needed, but to continually ebb away and destroy green belt areas, which both local communities and visitors from outside the area cherish, value and need, is totally unacceptable and immoral.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9065
<b>Person ID</b>	1267066
<b>Full Name</b>	Joanne Freedman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

* No	
<b>Comment</b>	The following is my response to the draft local plan. As a resident of Berkhamsted, I am concerned about drastic and irreversible changes to the character, amenity and health of the local area should this plan be adopted. I believe the issues are with the objectives of the plan rather than the individual sites, so I would ask that my comments are taken into consideration for each and every proposed development.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9068
<b>Person ID</b>	1267067
<b>Full Name</b>	KATHRYN BROWN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	SECTION 3: BOROUGH VSION  The Council's vision in this area presents, at first glance, a wonderful picture of how life could be for everyone, with a multitude of good homes, transport links, jobs and all in a well-managed environment with respect to carbon emissions and pollution.  Actually the plan appears to be far more about fitting in a full quota of new houses and where they will be built. The Council have plans to build 16,596 homes over the next 18 years. This is 114% over the 2013 Core Strategy. Some of these houses are intended to be built on Green Belt land on the edges of Berkhamsted and Tring. I do not understand why we now have a plan to build more houses than the 2013 Core Strategy requested, AND on Green Belt land. My understanding is that Green Belt land should only be built on in 'exceptional circumstances'. I have seen no evidence or explanation of these 'exceptional circumstances'.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9090

<b>Person ID</b>	1267074
<b>Full Name</b>	Joanne Howe
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.</p> <p>In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!</p> <p>In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.</p> <p>The Council’s proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9146
<b>Person ID</b>	211352
<b>Full Name</b>	Mr Andrew Sanderson
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>NO</p> <p>Specifically, I do not agree with 'The Vision for Dacorum's Places' relating to Berkhamsted or Tring. The proposed growth is simply too much for the towns – with circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, it equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint, most of which is located in Green Belt. I am concerned that the 2013 Core Strategy vision of “maintaining the strong valley and linear character of the settlement” has been dropped from the new Local Plan. Where previously the Council asserted that “The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported” (and put this argument strongly to the Planning Inspector), DBC now promotes the land for removal from Green Belt and suggests that development can now be built “in a way that takes account of sensitive views and landscape”. I strongly disagree with this premise and believe the 2013 vision should be re-instated.</p> <p>I note and agree with BRAG's analysis of the Government's clear support for the protection of the Green Belt. This set of policies is completely contravened by DBC's statements. The Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, therefore I do not understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified” that the number of houses proposed is not sustainable. Indeed, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town's historic character and setting”, but the new retrofit Borough Vision fails to reflect any of this.</p> <p>Why cannot Dacorum stand up for what is in the best interests of the residents of the Borough and their quality of life?</p> <p>What BRAG says about Hemel Hempstead is particularly worrying because it implies that DBC is losing an opportunity to regenerate and develop Hemel Hempstead while, at the same time, ruining the environs of Berkhamsted, and Tring by extensive building on the outskirts - far from transport, schools, shops and services.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9205
<b>Person ID</b>	1267203
<b>Full Name</b>	Ms Eileen Martin
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Question 1: Do you think the overarching vision, the vision for Dacorum's places and the strategic objectives are right for the Borough?</p> <p>No I do not think the Plan is right for the Borough</p> <p>Latest data suggests housing target should be 400 - 500 dwellings per year, but Dacorum target is 1000 per year. This cannot be justified.</p> <p>Release of Green Belt, which is meant to prevent towns coalescing, would be irreversible.</p> <p>I am concerned about the Station Gateway development. A shopping centre there could take business away from the town centre, which I'd like to see thriving.</p> <p>I feel it is reprehensible that the Plan suggests flats there to a height of 8 storeys. On a previous survey I, along with other residents, indicated that a height of 4 storeys was the reasonable maximum that is acceptable. This is to ensure any building is in keeping with the adjacent Moor which is a beautiful natural asset.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9228
<b>Person ID</b>	1264686
<b>Full Name</b>	Suzanne Doubleday

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9256
<b>Person ID</b>	1267329
<b>Full Name</b>	MARTIN DAVIES
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No

<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9270
<b>Person ID</b>	1267330
<b>Full Name</b>	Kat Worth
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9281
<b>Person ID</b>	1267333
<b>Full Name</b>	JO MURPHY
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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 my opposition to this draft Plan. DBC should revert to the Core Strategy vision statement.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9296
<b>Person ID</b>	1267332
<b>Full Name</b>	Nandi Jordan
<b>Organisation</b>	Chair Berkhamsted and Tring Labour Party
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Climate Change Emergency

The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.

The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.

#### Overarching Vision: Environmental Sustainability

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

#### Overarching Vision: Economic Growth

In addition to the Enviro-Tech aspirations in the plan we wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

#### Berkhamsted & Tring Developments

We welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9342
<b>Person ID</b>	1267365

<b>Full Name</b>	Mr Jont Cole
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built</p>

infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS9358

**Person ID**

1267367

**Full Name**

Sarah Johnson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.  
—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.

— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS9372

**Person ID** 1267368

**Full Name** Peter Leighton-Murray

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

**Comment** —No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.  
—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.  
— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS9386

**Person ID** 1267370

**Full Name** Patricia Beloe

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9406
<b>Person ID</b>	1267392
<b>Full Name</b>	TANYA VERBEEK
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.</p> <p>In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!</p>

In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.

The Council's proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS9433

**Person ID**

1267398

**Full Name**

Alexandra and James Donaldson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.

—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.

— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS9447

**Person ID**

1267401

**Full Name**

JACKIE BELLAMY

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<ul style="list-style-type: none"> <li>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</li> <li>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</li> <li>We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9471
<b>Person ID</b>	1157289
<b>Full Name</b>	Rodney O'Callaghan
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p>

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9474
<b>Person ID</b>	1267417
<b>Full Name</b>	Wendy and Paul Goodridge
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I have copied the main points below, of which I agree with every single one. In addition, I would like to reiterate that the levels of traffic are already very high in Berkhamsted high street and I do not think the town will cope with such a large influx of population. The argument for building on the green belt is very weak and based on outdated data, now more than ever we should protect the countryside from irreversible harm.</p> <p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9501
<b>Person ID</b>	399324
<b>Full Name</b>	Ms Julie Hollway
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Comment</b>	NO - the overarching vision, the vision for Dacorum's places and the strategic objectives are NOT right for the Borough . Some parts of the plan are good BUT irreversible destruction of Green Belt is abhorrent: sacrifice of 18 areas / 850 hectares within the borough that are within the Green Belt. Our green space within Hertfordshire will be lost forever. The borough is renowned for the quality and importance of its landscape and this will be ruined. People and therefore economy will NOT want to move here when the attraction has always been the rural nature of the environment.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9521
<b>Person ID</b>	1267427
<b>Full Name</b>	Megan Humphreys
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	
<b>Comment</b>	<p>My concerns regarding the building of new homes in South Berkhamsted are as follows:</p> <p>Borough Vision – The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9614
<b>Person ID</b>	1151590
<b>Full Name</b>	Lynda Clarke
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><u>Section (3) Borough Vision</u> – I completely agree with The Council’s Vision and the strategic objectives set. However I dont agree that the number of houses or their location supports the Council's laudable aims. Building 16,596 homes over the next 18yrs will destroy the nature of the market towns of Berkhamsted and Tring and does not support the important and sensible development of Hemel Hempstead as an important economic area well located in the South East. The detailed work carried out by the Council in the development of the earlier Core Strategy has not simply been properly updated taking into account local need and to support to the Governments need to create additional housing but has been destroyed by the blind acceptance to accept the Governments new targets requiring a 114% increase over the current plan. Much of this development will be in Green Belt areas that the Prime Minister has already said should not be developed except in EXCEPTIONAL CIRCUMSTANCES. What are these exceptional circumstances? Particularly when Berkhamsted has already has considerable increases in housing over the past 10 yrs (over that in Hemel Hempstead) and that an imaginative and large Garden Community development is being planned in Hemel, together with St Albans District Council in an area well located that could better support Councils aims and objectives.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9628
<b>Person ID</b>	1151590
<b>Full Name</b>	Lynda Clarke
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9642
<b>Person ID</b>	400471
<b>Full Name</b>	Mrs Ruth Constable
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I do not think that the target number of houses proposed for Dacorum in the Plan can be justified. There is a discrepancy between the 25% growth in housing proposed and the 9% forecast in population growth.  The 55% housing growth proposed for Tring is excessive. It would entail the release of Green Belt land.  Building on sites TR02 and TR03 East of Tring would severely impact on the Chilterns AONB. The open grassland at the foot of the Chilterns contributes to the beauty of the landscape. Such a large development would irreversibly damage

this landscape, the environment and the character of Tring and its immediate environs. Its scale is totally unsuitable to the area.

I recognise that there are difficulties in increasing housing in Hemel Hempstead, particularly "pinch points" at the railway station, but as the largest town in the borough, Hemel Hempstead is better suited to take more housing. It also can provide more brownfield sites and jobs.

The Plan has not evidenced the necessary "exceptional circumstances" required for the release of Green Belt land.

Whilst some growth in Tring will be necessary, there is no evidence to show how this could be achieved in different ways e.g. by using sites within the town's current boundaries.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS9654

**Person ID**

1267468

**Full Name**

Chris Berry

**Organisation**

CPRE Hertfordshire

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

This question is about the content of Chapters 2 and 3 of the Draft Plan in which these matters of principle are set out, but it is asked in the context of Chapter 1, which is not the subject of any of the Council's questions, but is fundamental to how the process of this Plan's preparation should proceed.

**Chapter 1** sets out the Council's 'Strategy for Growth' based on stated pre-determined considerations, which should have been the first focus of the current consultation, because they have not been properly consulted on hitherto, and yet are treated in the Draft Plan as if they have already been decided.

The Chapter emphasizes a series of Dacorum Borough Council (DBC ) corporate plans, 'agreements' and 'joint studies' with other public bodies and councils, treating their content as definitive, thereby limiting the scope of the Local Plan, proposing specific projects for development, and setting out courses of action as if they are already commitments which cannot be changed or properly considered in the light of current circumstances by the residents of Dacorum and other interested parties.

Hence while paragraphs 1.30 and 1.32 refer to being 'informed' by agreements with other authorities that the Council has 'engaged' with, these cannot pre-determine the Plan's strategy, which must emerge from the current consultation. Such 'agreements' and background studies over wider areas have clearly been on a selective basis as they have resulted in a list (paragraph 1.33) of ten 'Strategic Planning Matters' to be addressed by the Plan which do not even mention the words 'Green Belt', which is the single most important strategic planning provision in Dacorum and its neighbours for over 60 years, and which is still central to national planning policy.

This fundamental omission is strange, as protection of some important environmental designations with similar status in national policy is listed. Possibly it would look strange to be stating the importance of protecting the Green Belt when an item that is listed is the 'delivery of' (not the 'consideration of the acceptability of') Hemel Garden Communities (HGC), is presented in the list as if it has to be included in the Plan despite the scale of impact on the Green Belt. The list also includes meeting the needs of Watford, again as if this has already been decided whatever the consequences, and without the evidence for it being tested.

Sustainable development means delivering an environment to the next generation in an equal or better state than the one inherited and it is by no means certain that this Strategy will deliver that objective.

The text continues with 'statements of fact' rather than proposals, that the Plan will meet all its housing need as defined by national government formulae (paragraph 1.37) releasing additional Green Belt around Hemel as part of the HGC scheme for even longer term needs, and proceeds to announce (paragraph 1.41) that a new, wider plan for South West Hertfordshire, covering Dacorum, 'will come into force in 2023'.

CPRE Hertfordshire urges DBC to reconsider its strategy in the light of the responses to this consultation and, as stated in paragraph 1.48, the outcomes from the government Planning White Paper consultations and legislative changes, before deciding how to proceed not only with this Local Plan, but also with Plans and projects being proposed for the wider area of SW Herts.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9655
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

* No	
<b>Comment</b>	<b>Chapter 2</b> begins (paragraphs 2.1 and 2.3) with further pre-determined statements about 'managing a step-change in housing' when such a change has yet to be shown to be necessary in Dacorum, and CPRE Hertfordshire does not agree with this assumption and the absence of any qualifying reference to protection of designated and other countryside. The assertion that the level of housing growth is 'required by Government' is untrue and therefore misleading for those participating in the consultation, because national policy specifically states that setting a housing requirement must be a balancing exercise between need and other policies and constraints (NPPF paragraph 11 and footnote 6).
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9656
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The Housing section (paragraph 2.4) only refers to improving affordability through increased housebuilding, known to be a blunt and ineffective mechanism for doing this.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9657
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The Economic prosperity section asserts, without evidence from the current post Brexit and Covid context that there is a need to plan for significantly more employment floorspace, and that St Albans will take some of this increase. Both assertions need to be reconsidered before the Plan is prepared, as will the proposal to 'safeguard' other employment areas (paragraphs 2.7 and 2.9), now that the St Albans Plan has been withdrawn, and government policy and regulations seek to make better use of land and premises for housing in particular, through re-use, regeneration and redevelopment.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9658
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The Infrastructure section (paragraph 2.18) wrongly pre-judges the scale and location of development of 'Hemel Garden Communities', based on the Council's 'Infrastructure Delivery Plan' (IDP) a non-statutory document that has not been subject to Strategic Environmental Assessment or the development plan process, and cannot therefore determine what should be included in the statutory Local Plan. The IDP should therefore eventually reflect the result of the Local Plan process, not the other way round.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9659
<b>Person ID</b>	1267468

<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Paragraph 2.19 in the Natural Environment section is particularly disappointing, because the five stated elements said to reduce the impacts of growth, are nothing more than the existing basic requirements that all development should satisfy before being permitted, including legal commitments. Nothing is set out as part of the vision or strategy on the prevention of harm from individual proposals or the plan as a whole, in line with the well worded following paragraph 2.20.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9660
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	CPRE Hertfordshire is particularly concerned about the 'managing change' section. Paragraph 2.21 seeks to pre-determine that housing growth WILL signal significant changes to the Borough's towns and villages. Surely the potential implications of such profound changes must be addressed in the light of the current consultation and context, so that there is consensus on what changes are acceptable and tested through the examination of the Plan that is finally submitted by the Council. Declaring in paragraph 2.23 that there is evidence that Dacorum cannot meet all its housing and employment need without using greenfield Green Belt land, is just not true because any such evidence was based on completely different

data, economic and social circumstances, and national policy context, than exist now. The Council needs to reconsider both the facts of the current circumstances and how it chooses to address these through the Plan.

Para 2.24 lists the main elements of the Strategy and notes “protecting the character of the wider countryside and value of protected /important sites as far as possible (such as important landscapes, heritage and biodiversity and avoidance of areas at high risk of flooding”. This is incorrect and misleading. “As far as possible” is not an option and this statement sums up the whole attitude of the Strategy.

Sustainable development should be about delivering an environment for the next generation in an equal or better state than the one inherited. “As far as possible” not only does not achieve that objective, it is also contrary to national policy regarding protected sites and designated areas

The Council should be defending rigorously the natural capital of the Borough area, not adopting a strategic approach which allows that capital to survive only when left behind by its unjustified growth agenda. Mitigation and adapting to climate change is not sufficiently central to the vision and strategic objectives. There is no mention of the legal requirement for all sectors of the economy to reach net zero carbon by 2050, including those overseen by local authorities. Policies such as SP10 which proposes net zero carbon development only from 2030 jeopardises the aim of reaching net zero by 2050.

Consequently, the main 'strategy elements' set out in paragraph 2.24 must be reconsidered. To start with, the Green Belt is not even mentioned at all as one of the six elements and the relative scale and function of the various settlements has already been established over decades and centuries. A compelling case would have to be made by the Council to change this, and to promote the growth of villages that are currently consciously constrained as part of national, as well as local Green Belt policy.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9661
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* <b>Yes</b>	
* <b>No</b>	

<b>Comment</b>	The Covid recovery section in paragraph 2.28 focusses entirely on economic recovery in five of the nine proposed actions, with no reference at all to social or environmental recovery, or the climate change crisis and three of the others are solely principles, not actions, and must be reconsidered by the Council.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9662
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The graphic presentation of 'background information' on pages 19 and 20 is out of date and factually misleading, for example 'around 16,500 new homes 2020 - 2038' is contrary to more up to date information available to the Council last year, and failing to mention both the existence of the internationally important Chilterns Beechwoods Special Area of Conservation, the impending critical shortage of water supply, and the fact that there is no national health hospital commensurate with Dacorum's population.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9663
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><b>Chapter 3</b> proposes a 'Borough Vision to 2038', but this is based in two Dacorum Council internal plans and strategies, that have not been tested through the Planning process, and the erroneous statement in paragraph 3.2 that it (the vision) 'sets out how we will make the growth that the Local Plan is required to deliver...', when the Council must be aware that there is no such 'requirement.' It is for the Council to determine the scale of development through the formal local plan process, of which the current consultation is at an early stage, and subject to at least one further phase of consultation.</p> <p>CPRE Hertfordshire is concerned that there will be many residents and other stakeholders in Dacorum who are not familiar with the planning process, who will not understand that no definitive decisions on the scale and location of future development in the Borough have yet been taken, and that they are at liberty to contribute to that decision making process. Hence it is wrong for paragraph 3.5 to state that 'the priorities have been set by our councillors, taking into account "the vision" and what is most important to the Borough's residents'.</p> <p>This consultation is the first opportunity for priorities to be considered by the community, and they should be reconsidered in response to the consultation. None of the five priorities set by the councillors, and listed in paragraph 3.6, make any mention of the countryside, the Green Belt, biodiversity or climate change, and this is a major oversight.</p> <p>CPRE Hertfordshire accordingly urges the Council to reconsider the proposed wording of its 'overarching vision for growth by 2038', particularly to amend the statements about 'growth' at Hemel Garden Communities, Berkhamsted and Tring, and associated road building, avoiding, not mitigating, adverse impacts on the Chilterns Beechwoods SAC, all in the context of protecting the Green Belt and the AONB in particular.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9712
<b>Person ID</b>	1267480
<b>Full Name</b>	Paul Townsend
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Comment</b>	<p>The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.</p> <p>In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!</p> <p>In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.</p> <p>The Council's proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9753
<b>Person ID</b>	1264414
<b>Full Name</b>	Elaine Ridgway
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<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>

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 the proposed new houses. Shops built in previous housing development have remained empty. More houses but no addition retail is difficult to understand. Village school is at capacity and places at secondary school of choice hard to achieve.

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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS9781

**Person ID**

1267530

**Full Name**

Susan Lambiase

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

I am emailing to express my serious worries and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, notably the huge proposed development in the countryside and the impact this will have on the community and the environment.

There'll be a enormous detrimental impact :

- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation
- Over-provision of housing
- Failure to address climate emergency issues
- Impact on infrastructure and local community

- Likely water and water waste disposal issues and damage to chalk streams
- 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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS9789

**Person ID**

1267544

**Full Name**

CATHERINE HAY

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.

—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.

— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS9823

**Person ID**

**Full Name**

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

Marshcroft lane towards the canal is a very popular walking route for residents and others visiting the local area. This area should not be considered for development. The wildlife should be protected. During lockdown, this walking route has been invaluable to residents, providing a route to view the wildlife and our local countryside, whilst also benefiting our wellbeing. The protection of wildlife in this area and the countryside views provided from Marshcroft Lane are invaluable and should not be lost. The benefits it provides need to be maintained now and for future generations. It attracts visitors and walkers into the area - linking Tring to Aldbury and onto the Ridgeway.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

Tring Museum currently housed in Market Square is on the edge of a proposed development site. It is a building of historical importance in Tring and attracts visitors - it makes no sense that this small building is proposed for redevelopment.

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9850
<b>Person ID</b>	1267744
<b>Full Name</b>	GARETH BELLAMY
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<ul style="list-style-type: none"> <li>• No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</li> <li>• Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</li> <li>• We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS9912
<b>Person ID</b>	1267774
<b>Full Name</b>	AATMA SEESURRUN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural

resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.

Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.

In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!

In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.

The Council's proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS9990

**Person ID**

211488

**Full Name**

Ms Alison Cockerill

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

Yes

**Comment**

I have lived in the borough all my life and it saddens me greatly that Dacorum Borough Council, who have a good local reputation, particularly for social housing and waste disposal, should produce a Vision for 2038 which is so totally out of keeping with the area and so destructive to the environment.

I therefore wish to record my objections to the proposals on the Emerging Strategy for Growth document, with particular regard to Tring.

I am concerned by the overall lack of concrete detail in so many areas and the repetitive, unenforceable reliance on the appointed contractor to deliver. For example, page 179,22.21 'Developers should engage with the Clinical Commissioning Group', 22.57 'Developers will be expected to provide or make a contribution to community facilities' -nothing is mandatory.

On page 153 The Design Outcome and Principles should 'reinforce local character' and on page 14 in the Joint Strategic Plan 'new homes and developments will acknowledge local character'. Is there a plan for Tring Town Council to approve the exterior design of these proposed new homes? Indeed is the local council involved at all: have they had any input to this Plan and if not, why not? Covid 19 restrictions must not be used as an excuse to prevent public involvement-all progression must be halted until public meetings can take place.

Another major element of the Plan is cited in the Delivery Strategy 23.146, to include 'new and improved sustainable transport links to Tring Station, the town centre and surrounding neighbourhoods'. A lovely idea, but who is paying for this-the town centre service is vital to those who use it but has very few customers and is already heavily subsidised by HCC. Further use of public money for this project is not justified and to expect it to be self supporting is totally unrealistic.

Practical healthcare-not 'wellbeing'- is already a major concern in the town, with a heavy reliance on Buckinghamshire for medical services not available locally. Further development will only exacerbate this situation and DBC would do well to push for local clinics to be reinstated in Berkhamsted and Tring.

But the outstanding fallout from this Plan is the damage to the environment. Once again the responsibility is being passed to the developers; on page 119 18.21 'Developers must check for the presence of protected species'. This is not acceptable. Developers have a vested interest to not find any protected species-any they find will cost them time and money. This check must be carried out by an independent body.

It is of great concern that the borough contains three chalk streams, an internationally rare habitat, which are officially deemed to be in poor condition, a national disgrace. If DBC is not able to manage an area of international importance there is little hope of them caring about or for any other environment in the borough.

The Plan is indefensible in its current format and needs a complete revision. The proposed number of dwellings is now out of date with the revised figures from central government, and there are no benchmarks by which to measure the success or failure of any aspect of the plan, including the Overarching Vision. One statement however is absolutely correct; page 178 22.12 says 'The Plan has a (measurable?) effect on physical and mental health'. I have lived in Tring all my life and I have never read anything so distressing; it does a great disservice to both DBC and the residents of the borough.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10005

**Person ID**

1267858

**Full Name**

KATE & PHIL BAILEY

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Borough Vision</p> <p>We do not support the Borough Vision. Notably, the proposed growth for Berkhamsted is too big for the town with over 2,200 houses proposed in Berkhamsted and Northchurch, increasing the number of dwellings in the town by almost a quarter. What's more, many of these are located on greenfield green belt locations. What are the exceptional circumstances which make it necessary to build on this green belt land? Why have the 2014 ONS housing estimates been used as baseline, rather than the updated and more relevant 2018 estimates? Growth of this size is not justified, neither is it sustainable - adding congestion to an already busy and congested town, with no additional jobs to support the increased population, or satisfactory infrastructure. It appears that the council have just bowed down to government requests for housing that does not take into account housing development and densities achieved since 2013.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10013
<b>Person ID</b>	1267862
<b>Full Name</b>	ALEX CHAPLIN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>1/ Do you think the overarching vision and strategic objectives are right for the Borough?</p> <p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p>

— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS10044

**Person ID** 1155402

**Full Name** Christopher Stafford

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Comment**

Section (3)

Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS10079

<b>Person ID</b>	1263701
<b>Full Name</b>	Richard Bragg
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I believe that that teh growth strategy is based on out of date figures given that the government has changing it's policy and the growth strategy needs to be changed accordingly.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10083
<b>Person ID</b>	1268034
<b>Full Name</b>	MR IAN GUNTER-JONES
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I vehemently dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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 Dacor um for the same period.</p> <p>I believe there is enough non green belt land identified within the Dacorum Local Plan to provide 5, 950 houses.</p>

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

However, i believe that the new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth)

This fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period. There is only a 13% growth referred to in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough –

a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Heme l Hempstead with the remaining growth shared equally between the remaining settlements.

This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

I believe that the delivery of a sustainable level of new development should be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10095
<b>Person ID</b>	1268038
<b>Full Name</b>	LIZ JAZAYERI
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I am emailing to register my objection to the plans as proposed in your over complicated documents,</p> <p>&gt; To even consider a plan for the next 18 years that looks to build 1000 new homes a year is ridiculous. There is not the infrastructure in place to cope with this level of development and parts of Dacorum are already suffering with over development (Apsley is a prime example).</p> <p>&gt; So you do not have my vote with this absurd development suggestion.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10101
<b>Person ID</b>	1268045
<b>Full Name</b>	C PERRY
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p>

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovington, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10116

**Person ID**

1146091

**Full Name**

Mr John Foster

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

—A#1: No I dont. Building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London and the houses are generally very pricy so only 'wealthy' people can afford them.  
Also, developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers. We should take time to have a housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10152

**Person ID**

1268071

<b>Full Name</b>	LINDA SLIM
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10219
<b>Person ID</b>	1268167
<b>Full Name</b>	CHRIS YOUDELL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Borough Vision – The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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</p>

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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10259

**Person ID**

1264346

**Full Name**

Alison Friend

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The current version of the plan does not adequately address four of its own objectives: 'Mitigating and adapting to climate change', 'Conserving and protecting the natural environment', 'Promoting and facilitating sustainable transport and connectivity' and 'Supporting community health, wellbeing and cohesion'. If these points are not addressed, then the council may endure protracted legal proceedings.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10275

**Person ID**

399324

**Full Name**

Ms Julie Hollway

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	NO - the overarching vision, the vision for Dacorum's places and the strategic objectives are NOT right for the Borough . Some parts of the plan are good BUT irreversible destruction of Green Belt is abhorrent: sacrifice of 18 areas / 850 hectares within the borough that are within the Green Belt. Our green space within Hertfordshire will be lost forever. The borough is renowned for the quality and importance of its landscape and this will be ruined. People and therefore economy will NOT want to move here when the attraction has always been the rural nature of the environment.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10285
<b>Person ID</b>	1268236
<b>Full Name</b>	STEVE ROBERTS
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	A) I was generally supportive of the 2013 Core Strategy and can support the aspirations of the Borough Vision. This means that I am broadly in agreement with the reasons why some changes are needed.  B) However, I feel that the implementation proposed in the Draft Local Plan does not adequately reflect the Borough's vision. In particular, it falls far short of meeting aspirations for sustainability and quality of life, particularly with the growing emphasis on issues including climate change and management of water assets. The Draft Local Plan therefore does not have my support for how our community should develop.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10308

<b>Person ID</b>	1268339
<b>Full Name</b>	Mr Adam Craig
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p><b>Do you think the overarching vision and strategic objectives are right for the Borough?</b></p> <p>No. In our opinion, building more houses within the London commuter belt will not reduce house prices for local people looking for their first home, it will just attract more commuters moving out from London, with higher savings and deposits. Developer led housing will not provide more social housing for those on the waiting list. It only just benefit developers. We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10317
<b>Person ID</b>	1268350
<b>Full Name</b>	Mrs Tamsyn Craig
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p><b>Do you think the overarching vision and strategic objectives are right for the Borough?</b></p> <p>No. In our opinion, building more houses within the London commuter belt will not reduce house prices for local people looking for their first home, it will just attract more commuters moving out from London, with higher savings and deposits.</p>

Developer led housing will not provide more social housing for those on the waiting list. It only just benefit developers. We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10338

**Person ID**

1268418

**Full Name**

JOSEPHINE O'NEILL

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**Over-provision of housing based on inaccurate and superseded data**

I believe the council's vision is flawed as it is based on out of date ONS data which has led to a significant over-estimate of Dacorum's housing needs. Please see my comments for Question 7. Put simply, the predicted levels of growth and hence yearly targets for associated housing development are too high.

**Climate Emergency Issues**

Dacorum Borough Council has declared a climate emergency and indicated that this should be a central pillar in any future plans for the borough. This local plan vision as published prioritises economic growth and greenfield land development over considerations for the climate emergency. 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.

**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)

**Berkhamsted & Tring Developments**

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

**Included files****Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10352

**Person ID**

1268423

**Full Name**

Miranda and Alan Cummins

**Organisation****Agent ID****Agent Full Name****Agent Organisation****Yes / No**

No

\* Yes

\* No

**Comment**

We would like to object to 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth is obviously too much for the town. With circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, this equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint, most of which is located within sensitive ridge top locations in Green Belt.

We note that the 2013 Core Strategy vision of "maintaining the strong valley and linear character of the settlement" has now been emphatically dumped. Where previously the Council asserted that "The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported" (and put this argument strongly to the Planning Inspector), DBC now promote the land for removal from Green Belt and suggests that development can now be built "in a way that takes account of sensitive views and landscape". The plan removes green belt areas that have become and are becoming increasingly popular walking/rambling routes and provide easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes. Over the pandemic residents have much valued and appreciated the immediate and wider countryside.

**Included files****Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS10355
<b>Person ID</b>	1268427
<b>Full Name</b>	GRAHAM HAYNES
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The vision and objectives are vague and vacuous. They are not specific or measurable. There is no indication of how potential conflicts between objectives (for example homes for everyone versus protecting the natural environment) will be addressed or resolved.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10385
<b>Person ID</b>	1264613
<b>Full Name</b>	Susan Kane
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	I object to the plans to increase the plan to increase the size of Decorum housing by such a large number of houses, in particular Tring increaseing the number of housing by 55% taking up much needed farm land and where are this number of people going to work? There is not enough Doctors or schools ect for this number of people.  I do appreciate that more housing is needed but it should not increase by this percentage in any area.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10387
<b>Person ID</b>	1268432
<b>Full Name</b>	SARAH STUBBS
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable. In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!</p> <p>In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.</p> <p>The Council's proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10425
<b>Person ID</b>	1268440

<b>Full Name</b>	Mrs Michele Larkin
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Make sure you can sell the houses you build before building new ones. And build on brown land as a priority. Or in towns to regenerate urban areas rather than defacing the countryside and killing wildlife.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10438
<b>Person ID</b>	1268446
<b>Full Name</b>	JOHN KING
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	Additional housing is needed to support the natural growth of the area. But the Towns in Dacorum need to retain 'Open Space'
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10443
<b>Person ID</b>	1268447

<b>Full Name</b>	Justin Kington
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I am raising profound objections to the Dacorum Borough Council Local Plan 2020 - 2038.</p> <p>If it comes to fruition then I can see the joy of living in such a beautiful area of the country being completely destroyed. The Plan seems detached from the age we are living through.</p> <p>It makes scant allowance for the environmental collapse that threatens to change our lives forever. It uses outdated housing projections, takes no account of geography, is not sustainable, doesn't properly consider pollution and even proposes development on Greenbelt land.</p> <p>May I suggest this is the time to reject business as usual which we know is fast destroying our planet and our children's life chances. This is the time for the council to radically reappraise the purpose of such planning and to prioritise our irreplaceable environment over income generation and house-building directed by government. There is an opportunity to develop a better vision, more in keeping with the times we are living through.</p> <p>Thank you for considering this argument.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10447
<b>Person ID</b>	1268450
<b>Full Name</b>	JOSEPH STOPPS
<b>Organisation</b>	DACORUM GREEN PARTY
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan. Currently it is not. The Local Plan is aspirational but lacks firm quantifiable commitments. We have the knowledge and technology to make good affordable zero carbon sustainable homes. The Local Plan must prioritise this. Currently the Local Plan fails to demonstrate a pathway to local carbon reductions. The plan is unambitious and does not commit to any level of sustainability in its sustainability goals. The proposed plan has clearly prioritized economic growth over considerations for the climate emergency. Several local authorities in England (e.g., Greater Cambridge, Reading and Liverpool City) have developed integrated local plans that take account of climate change, biodiversity, well-being and social inclusion. There is no evidence in the proposed local plan of such an approach.</p> <p>We must build better certified sustainable net zero homes in Dacorum and make firm sustainable commitments in the Local Plan.</p> <p>The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. We are calling for the buildings to be externally certified to sustainable standards. Every part of the building process must be net zero (including scope 3). The new homes must also have sustainability designed into them. For example; every property with a parking space should have an electric vehicle charger built into it. Every property should have a dual aspect to allow for natural ventilation. The new homes must incorporate solar PVs and other sustainable sources where appropriate. No combustion heater should be in any home and each home should collect rain water collection for toilets. The homes must have top class insulation. These standards should be in the Local Plan and all developers must commit to these standards.</p> <p>The homes must be affordable. Building sustainable housing does not mean it becomes unaffordable. We welcome the commitment to genuinely affordable housing to be included in developments but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing. We call for the 40% minimum affordable homes objective to be enforced across the Borough.</p> <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</p> <p>ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects.</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).

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10488

**Person ID**

869129

**Full Name**

Ms Ann Hetherington

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10536

**Person ID**

1268671

**Full Name**

Mr Mike Jennings

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

<p>* <b>Yes</b></p> <p>* <b>No</b></p>	
<p><b>Comment</b></p>	<p>The Vision and Objectives provide a framework for the compilation of the plan. However the Draft Plan as it stands is totally inadequate when measured against its own Vision and Objectives.</p> <p>With the development proposed for my particular area I would strongly urge the comments made by Tring in Transition to be acted upon and incorporated into the proposals.</p> <p>As a general observation I would point out that there is a wealth of Government policy and guidance documents which are available to which the Draft Local Plan pays lip service but is not reflected in the proposals. Dacorum's housing requirement is based on inaccurate forecasting at a national level (RTPI 2/10/20) together with an excessive demand by the local authority for additional development on top of the erroneous Government requirement. Dacorum has a large amount of land that is of high environmental quality, already subject to excessive pressure from the existing population. This high biodiversity interest together with the topography and the local landscape character of winding lanes that meander through much of the area clearly illustrates that the proposals in the draft plan display a lack of understanding of the adverse, irreversible impacts that would result if the proposals were to be implemented.</p> <p>A failure to comply with legislation and policy will make it likely that the document will be referred to the newly formed Office for Environmental Protection (OEP). The OEP will be able to receive and investigate complaints on alleged serious breaches of environmental law by public authorities and take legal action as a last resort.</p> <p>Through adopting an inflated figure for the Borough's development requirement the plan must, by definition, fail to provide the necessary solutions to many of the other questions posed in this consultation.</p> <p>The effects of climate change and the impacts from increasing human pressure on the environment are such that a local plan needs to be based on standards of excellence, delivering truly sustainable growth fit for purpose. It needs to address Net Environmental Gain (NEG) on Green Belt land in a way that ensures its delivery. There is no evidence that the draft plan has given due consideration to these requirements.</p>
<p><b>Included files</b></p>	
<p><b>Consultation Point</b></p>	<p>Borough Vision to 2038</p>
<p><b>Comment ID</b></p>	<p>EGS10549</p>
<p><b>Person ID</b></p>	<p>1268687</p>
<p><b>Full Name</b></p>	<p>Ms Isabelle Robinson</p>

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>DBC overstates the housing need.</p> <p>Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.</p> <p>Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."</p> <p>There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.</p> <p>A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.</p> <p>Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.</p> <p>DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10555
<b>Person ID</b>	1268702
<b>Full Name</b>	Kirstin Chaplin
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p><b>Do you think the overarching vision and strategic objectives are right for the Borough?</b></p> <p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10567
<b>Person ID</b>	1164729
<b>Full Name</b>	David Clarke
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10591
<b>Person ID</b>	1268725
<b>Full Name</b>	CHARLOTTE SMITH
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The numbers are wrong. DBC overstate the housing need. Brexit, the pandemic and the net export of well over a million people from the UK add to an already tenuous case for more dwellings, for instance South West Herts Local Housing

Needs Assessment Final Report - September 2020 (PDF 2MB), a study by G.L. Hearn and covers neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."

There is therefore no extraordinary reason or need for Green Belt to be encroached and these plans should be stopped immediately

The plan is over 18 years, this seems excessive when the future is uncertain. DBC would do better to develop the short term plan it is required to do focussing on builds outside of Green Belt and with an aim to rejuvenate town centres

Dacorum planning does not seem to know the areas very well for instance Northchurch is not West Berkhamsted. It is a village in its own right, it predates Berkhamsted and as a village its semi rural character and stunning views should not be violated by the proposed builds on Greenbelt, particular BK06 and BK07

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10595
<b>Person ID</b>	1268726
<b>Full Name</b>	DR ADRIENNE GARNER
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I believe that the current Coronavirus pandemic has made the future very uncertain and that it would be best to wait to see how things turn out before committing to building more homes in what has been considered a prime commuter area due to its proximity to London.</p> <p>I suspect that more people are going to be able to work from home and that large offices in the city will no longer be needed. It is my belief that in future there will not be such a massive need for homes in the already crowded SE of England.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10619
<b>Person ID</b>	1268732
<b>Full Name</b>	KATRINA BECKWITH
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I accept the general opportunities and challenges of growth.</p> <p>However I strongly object to the consideration taht Tring is required to 'play a much greater role in delivering housing growth' within the borough, as such growth is proposed to be delivered by way of disproportionate Green Belt allocation.</p> <p>The vision for Tring seeks to have 'delivered a acomprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape and protected environbmental sites'. I strongly object to this on the basis that planned new neighbourhood cannot be justified through evidence, nor is it possible to restrospectively take account of the impact on its landscape and protected sites once development has commenced, due to the hard any erosion of land to the East of Tring would have on its Green Belt and AONB setting.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10655
<b>Person ID</b>	1268741
<b>Full Name</b>	BRIAN WHITEHEAD
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	The strategy of expanding Berkhamsted and particularly Tring is out of proportion and pays no regard to their status as small market towns with limited infrastructure and job opportunity. It can only lead to increased commuting to the surrounding metropolises of London, Milton Keynes, Luton and Watford contrary to climate change objectives and it would be achieved at the expense of our natural environment
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10664
<b>Person ID</b>	1161079
<b>Full Name</b>	Melanie Llewellyn
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>Specifically, I do not agree with ‘The Vision for Dacorum’s Places’ relating to Berkhamsted or Tring. The proposed growth is simply too much for the towns – with circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, it equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint, most of which is located in Green Belt. I am concerned that the 2013 Core Strategy vision of “maintaining the strong valley and linear character of the settlement” has been dropped from the new Local Plan. Where previously the Council asserted that “The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported” (and put this argument strongly to the Planning Inspector), DBC now promotes the land for removal from Green Belt and suggests that development can now be built “in a way that takes account of sensitive views and landscape”. I strongly disagree with this premise and believe the 2013 vision should be re-instated.</p> <p>I note and agree with BRAG’s analysis of the Government’s clear support for the protection of the Green Belt. This set of policies is completely contravened by DCB’s statements. The Government has made it clear the numbers are NOT</p>

targets and Green Belt should be afforded the highest protection, therefore I do not understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified” that the number of houses proposed is not sustainable. Indeed, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the new retrofit Borough Vision fails to reflect any of this.

Why cannot Dacorum stand up for what is in the best interests of the residents of the Borough and their quality of life? What BRAG says about Hemel Hempstead is particularly worrying because it implies that DBC is losing an opportunity to regenerate and develop Hemel Hempstead while ruining the environs of Berkhamsted, and Tring by extensive building on the outskirts far from transport, schools, shops and services.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10682

**Person ID**

1268744

**Full Name**

DAVID FULLER

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

- Green Belt land should only be developed in exceptional circumstances and that case has not been made, especially as alternative Brownfield sites are available
- The calculation of the number of houses required to be built is flawed as out of date ONS figures have been used resulting in the amount of additional housing proposed being unnecessarily high
- Growth in housing should be accompanied by growth in employment to reduce unnecessary personal journeys to and from work/the railway station which could be better achieved by building new houses in Hemel Hempstead, rather than Berkhamsted and Tring, where there is a natural centre of local employment, infrastructure, transport hub, civic amenities etc
- Berkhamsted with proposed additional housing of 2200 has no capacity for increased local employment and the number of houses is out of proportion to its current size. The impact on local infrastructure will be significant especially the road systems, where the High Street and London Road are already very congested at peak times, especially during early morning and late afternoon.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10703
<b>Person ID</b>	1268746
<b>Full Name</b>	DANIEL GARROD
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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> <p>The proposed number of houses to be built on green belt land seems totally disproportionate to the size of local communities.</p> <p>It was my understanding that under the UK government's housing development proposals greenbelt land was only to be considered under 'exceptional circumstance'. The council has done nothing to explain why the proposed developments have exceptional elements which justify them.</p> <p>The land chosen for the development especially BK01 seems to be based solely on maximising the value of housing stock built i.e. it is a developer-led profit maximising agenda rather than adequately considering other local stakeholders.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10715

<b>Person ID</b>	1145421
<b>Full Name</b>	Mrs Shirley White
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Sorry I was unable to complete my full submission via the requested portal as I couldn't find the correct sections to add my comments when I returned to the document after a break. I was only able to add comments to sections 3 and 4 so I am sending my remaining comments via email.</p> <p>In general I am unhappy by the whole process. We all would like a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Neutral and the environment and natural resources protected. However this draft Plan is about how many new homes can be built and where they should be located. The Council should have tried harder to reduce the new housing in Dacorum. The majority of new homes in Berkhamsted and Tring are purchased by rich people moving into the area rather than for existing Dacorum residents, who can't afford the inflated prices.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10729
<b>Person ID</b>	1145586
<b>Full Name</b>	Miss Hannah Moynehan
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<b>Climate Change Emergency</b>

The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.

The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10751

**Person ID**

1268754

**Full Name**

Mrs Rebecca Lumsdon

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Please see answers below - my specific objection is to building works on the proposed Bank Mill Lane site.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10759
<b>Person ID</b>	1268755
<b>Full Name</b>	Mrs Lesley Reynolds
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Too many properties proposed without due consideration to the existing infrastructure of the borough and villages included therein.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10766
<b>Person ID</b>	1268759
<b>Full Name</b>	Mrs Catherine Rudin
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly disagree with the scale of the target for housing in Dacorum suggested by this Local Plan - a 25% growth (16,596 houses) in housing, yet there is a 9% (5,950 houses) population growth forecast by the ONS in Dacorum for the same period. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses. I support the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing. This would make the most efficient use of brownfield land, local services, and would facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision suggests a totally disproportionate growth strategy for housing within Tring (55% growth). This fails to acknowledge the contribution that Bovington, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements. I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements.</p> <p>Whilst I accept the aspirations of existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty. I object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.</p> <p>I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.</p> <p>The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.</p>

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files****Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10775

**Person ID**

1268761

**Full Name**

Mr David Colvin

**Organisation****Agent ID****Agent Full Name****Agent Organisation****Yes / No**

No

\* Yes

\* No

**Comment**

I recognise the need for future housing developments within the Borough, but am of the opinion that the developments proposed within Tring are of great concern, due the excessive numbers proposed.

**Included files****Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10779

**Person ID**

1268762

**Full Name**

Mrs Natalie Hill

**Organisation****Agent ID****Agent Full Name****Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.</p> <p>I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.</p>

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10788

**Person ID**

1268763

**Full Name**

Mr Michael Hill

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10798

<b>Person ID</b>	1268764
<b>Full Name</b>	Darren Cartwright
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>Firstly I think it's a disgrace you as a council have built and are currently building houses extra in hemel. [content removed].</p> <p>Then I here about 16,0000 more house,that will [content removed] hemel up completely,traffic is already bad,there a 30 min que to get on the M1 in the mornings already.</p> <p>Don't let this happen</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10799
<b>Person ID</b>	865182
<b>Full Name</b>	Mrs Diana Lai
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	For the attention of Council Members:

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?

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.

Instinctively, I oppose the destruction of our precious and beautiful Green Belt land which is so important, both physically and mentally, for the residents of the borough as well as vital for our beleaguered wildlife whose habitats are alarmingly becoming increasingly degraded or disappearing altogether!

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**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10806

**Person ID**

1268768

**Full Name**

Amanda Stafford

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

Section (3)

Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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. (4)

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10827

**Person ID**

1268791

**Full Name**

ELIZABETH FULLER

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

- Green Belt land should only be developed in exceptional circumstances and that case has not been made, especially as alternative Brownfield sites are available
- The calculation of the number of houses required to be built is flawed as out of date ONS figures have been used resulting in the amount of additional housing proposed being unnecessarily high
- Growth in housing should be accompanied by growth in employment to reduce unnecessary personal journeys to and from work/the railway station which could be better achieved by building new houses in Hemel Hempstead, rather than Berkhamsted and Tring, where there is a natural centre of local employment, infrastructure, transport hub, civic amenities etc
- Berkhamsted with proposed additional housing of 2200 has no capacity for increased local employment and the number of houses is out of proportion to its current size. The impact on local infrastructure will be significant especially the road systems, where the High Street and London Road are already very congested at peak times, especially during early morning and late afternoon.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10838
<b>Person ID</b>	1145633
<b>Full Name</b>	Mrs Suzanne Nixon
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I question whether the scale of development proposed across the borough is actually needed.</p> <p>I understand that the impetus for this originated with central government, but I think that the data on which they base the case for development on this scale may already be outdated.</p> <p>I accept that some development is inevitable and can be positive, but what is proposed will be overwhelming, particularly for smaller towns.</p> <p>I would appeal to Dacorum to negotiate a reduction in numbers. The National Planning Policy Framework allows local authorities to restrict the scale of development due to factors such as Green Belt and AONB planning constraints. What is proposed will certainly have a negative impact on both of these.</p> <p>I am very opposed to building on greenbelt land. See also my comments on specific sites.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10868
<b>Person ID</b>	1268798
<b>Full Name</b>	BARBARA PAGE

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I am writing to express my responses to the request for feedback on the New Dacorum Local Plan Emerging Strategy as set out on the Dacorum planning development website. I have very limited time, and therefore am focussing my responses on three specific areas - Section 3, 4 and 5 of the plan.</p> <p>I oppose this strategy - as outlined below.</p> <p><b>Section (3) Borough Vision Do you think the overarching vision, the vision for Dacorum’s places and the strategic objectives are right for the Borough?</b></p> <p>My response:</p> <p>NO</p> <p>This plan as offered seems to offer few, if any improvements to the borough and will cause significant detriment to Berkhamsted. The proposed growth offers a 24% increase in dwellings and a 31% growth of the urban footprint mostly in sensitive ridge top locations in Green Belt - but offers no significant vision for the future employment, education, health or wellbeing of the town's residents.</p> <p>The vision to provide “significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town” sounds great. However, the policy suggestions do not fit in with this vision at all.</p> <p>I don't see how building lots of out of town homes on top of very steep hills fits in with that vision. Instead it will only serve to promote unsustainable high-carbon forms of travel rather than walking and cycling.</p>

Instead, the plan offers more traffic, more congestion, more pollution and more climate-damaging carbon emissions. It removes areas that have become and are becoming increasingly popular walking/rambling routes and the easy access to the wider countryside that has been so critical for the health and wellbeing of local residents during the pandemic.

The increased number of car movements within the expanded urban area will be circa 15,400 per day. Berkhamsted's roads are already hugely congested (in non pandemic times).

How can this be a futuristic, low-carbon vision for the town? It's a vision at odds with the current climate emergency. It's a vision that ignores Berkhamsted's current grave road infrastructure issues. It's a vision that pays callous disregard to the needs of existing residents. It is not a vision that promotes a sustainable, low-carbon future for our children and their children.

New developments need to be close to existing transport hubs. New developments need to make more use of existing brownfield sites, not expanded areas of greenfield sites. New developments should not encroach on dwindling areas of green belt alongside areas of natural beauty.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10871

**Person ID**

619474

**Full Name**

Miss Brenda Mariner

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

The plans are too extensive for a town of this size. The infrastructure would not support this and essential facilities such as a Hospital and Theatre have disappeared from the town with no hope of replacement.

Vital areas of Green Spaces and Green Belt would be lost forever and the character of the town would be destroyed.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10877

**Person ID**

1149755

**Full Name**

MR CHRIS PICHON

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Dacorum BC Draft Local Plan sets out a vision which is totally out of all proportion to the needs of the residents of the Borough. It is a vision based on a growth forecast which has no basis of reality, particularly following the Covid Pandemic. The housing targets are a fictitious number conjured from a centralised government dictat which has no bearing of the actual housing need of the Borough.

Housing needs would fall into three catagories 1. Socila Housing. 2. Starter Homes for first time buyers, and 3. Retirement Accomodation for the elderly.

The Local Plan fails to spcify specific targets in these three categories which means the Borough will be at the mercy of private house builders wanting to build for profit rather than social need.

The housing targets are likely to be fulfilled by building on Green Belt land which I am totally against. There is a significant amount of brownfield sites in and around Hemel Hempstead that the Council has allowed to stand idle for many years, the Lucas sites in Maylands Avenue fro example, and should be targeted.

The amount of land required to build the housing numbers will decimate the green belt and create environmental issue which don't exist today. This at a time when The UK Government has committed to new Climate change policies to protect the environment.

There appears to be no account being taken of the Covid crisis and the economic development fallout resulting from it. The Retail Sector is being fundamentally challenged and there is no doubt large swathes of retail properties will become redundant, we've already seen Debenhams close and many others will follow suit. In addition to this there are likely to be large numbers of office blocks becoming redundant with the upsurge in home working. Many of the units on Maylands Avenue will fall into this category. Surely a Plan stretching to 2038 should be taking these factors into account?

The roads in and around the Borough are too often bulging with traffic which is an issue in every main town and village in the Borough. Adding thousands of more houses will only worsen this for residents. This isn't solving a problem, it's creating new and adding to existing issues.

There is also an increasing issue with boundary developments with adjacent boroughs. Three Rivers District Council is targeting huge housing numbers right on the boundary with Kings Langley which will add greatly to the local issue. If further development is encouraged Kings Langley will be over-run. There should be a combined strategic Plan that works with Three Rivers and St Albans and Watford BCs.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10883

**Person ID**

1268804

**Full Name**

Mr Mark Dixon

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Over-provision of housing is based on inaccurate and superseded data

I believe the council's vision is fundamentally flawed as it is based on out of date ONS data which has led to a significant over-estimate of Dacorum's housing needs.

The predicted levels of growth and hence, annual targets for associated housing development are too high.

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) Berkhamsted & Tring Developments.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

Climate Emergency Issues

Dacorum Borough Council has declared a climate emergency and indicated that this should be a central pillar in any future plans for the borough. This local plan vision as published prioritises economic growth and greenfield land development over considerations for the

climate emergency. 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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10890

**Person ID**

1268687

**Full Name**

Ms Isabelle Robinson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

DBC overstates the housing need.

Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.

Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."

There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.

A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.

Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.

DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10896
<b>Person ID</b>	1268814
<b>Full Name</b>	Ms Emma Cotton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p><b>Over-provision of housing based on inaccurate and superseded data</b></p> <p>I believe the council's vision is flawed as it is based on out of date ONS data which has led to a significant over-estimate of Dacorum's housing needs. Please see my comments for Question 7. Put simply, the predicted levels of growth and hence yearly targets for associated housing development are too high.</p> <p><b>Climate Emergency Issues</b></p> <p>Dacorum Borough Council has declared a climate emergency and indicated that this should be a central pillar in any future plans for the borough. This local plan vision as published prioritises economic growth and greenfield land development over considerations for the climate emergency. 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.</p> <p><b>Protecting Green Belt land &amp; Conserving and enhancing the natural environment</b></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> <p><b>Berkhamsted &amp; Tring Developments</b></p> <p>The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10939
<b>Person ID</b>	1268880
<b>Full Name</b>	Ms Jo-anne Tunmer
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>In response to the draft local plan entitled ‘<i>Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation</i>’ I would like to register my objections as follows:</p> <p><b>1) Do you think the overarching vision and strategic objectives are right for the Borough?</b></p> <p>A properly thought through housing strategy should be at the forefront of any development proposals. I don’t believe that this is currently the case and hence my <u>objection to the plan</u>. We need the right type of houses in the right places for local residents. Developer lead housing will not be in the interests of the local residents, rather to the benefit of the developers. It is doubtful whether it will provide any social housing for those on the waiting list. Furthermore, building more houses within the London commuter belt will not reduce house prices for local people looking for their first home - rather attract more commuters moving out from London.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS10950
<b>Person ID</b>	1268886
<b>Full Name</b>	Mr Paul Jayson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built</p>

in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10973

**Person ID**

1268903

**Full Name**

ANGELA NODDER

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The plan represents an overdevelopment of the local area

This will outstretch the local infrastructure, which is already struggling to cope, especially with regard to traffic and road management and local health service provision.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS10982

**Person ID**

1162376

**Full Name**

Jade Holmes

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11000

**Person ID**

1263256

**Full Name**

Anthony Blumsom

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The development proposes to increase the size of Tring by 55% with inadequate consideration on appropriate infrastructure such as school places, childcare, doctors, parking, sports and recreation facilities and utilities. Furthermore, there has been a poor level of consideration for developing brownfield sites and a deliberate focus on developing green belt land such as Grove Fields, sandwiched as it is up against two beautiful swathes of biodiverse AONB. Where is the environmental and green rationale here?</p> <p>Proposed development across Dacorum displays similar contempt for environmental concerns and NPPF Planning Policy requiring green belt development take place only under exceptional circumstances. The proposed development has a deliberate focus on building over biodiverse AONB, green belt and ancient woodland. There is far too little consideration given to sustainability. In Berkhamsted as in Tring, infrastructure considerations are far too low. Already congested on road and rail, it seems completely implausible that Berkhamsted can cope with such an enormous population, traffic and utilities addition as the one proposed.</p> <p>The plan is incompetent, environmentally crass and will certainly result in a dramatic reduction in quality of life for the majority of Dacorum residents, both present and future. It seems inconceivable that a taxation funded project so many years in the making should have delivered so widely off the mark. But is anyone really listening?</p> <p>Please stop this road crash before it happens.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11005
<b>Person ID</b>	333882
<b>Full Name</b>	Mr Mark Barfield
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

\* Yes  
\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I would call for fewer houses to be built on green belt land and for the Local Plan to have the climate emergency fully integrated into its targets and objectives. I strongly object to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock. 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 simplistic algorithm.

The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects.

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, as recommended by national planning guidance. This draft Local Plan fails to demonstrate a pathway to local zero carbon or enhancements to biodiversity. The plan is unambitious and does not commit to any level of sustainability in its sustainability targets. The proposed plan has clearly prioritised house building growth over considerations for the climate emergency.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11020

**Person ID**

1268909

**Full Name**

Dr Leslie Kennedy

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I have been a resident of this area since 1957, The proposed development at Long Marston of a new settlement of over 3000 homes is completely inappropriate for a number of reasons..

- 1 The area is a known flood plain & the new homes will be a significant risk of flooding unless very extensive flood risk mitigation risks are implemented. As a young teenager I use to visit the fields in the wet season to gather wild mushrooms growing in the wet environment.
- 2 The road infrastructure around the proposes site is already overloaded and without the construction of major new access roads with consequent environmental impact the site will be unsustainable because of the consequent traffic movements. Whilst fossil fuel cars can be expected to be reduced it is forecast that electric vehicles will take their place and these will need new infrastructure.
- 3 There is no reference to the impact on the nearby wildlife sites at Wilstone Reservoir and Startops Reservoir and the consequence of the resultant additional traffic and visitors

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS11039
<b>Person ID</b>	1145445
<b>Full Name</b>	Mr Jason McInerney
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

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**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS11053
<b>Person ID</b>	1268912
<b>Full Name</b>	SIAN FITZPATRICK
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Whilst I appreciate the need for additional housing within Dacorum, the destruction of greenbelt land to create this is totally unacceptable and damaging to communities and the future of Hertfordshire.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11060
<b>Person ID</b>	1268913
<b>Full Name</b>	SONIA FAIRBARN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Dacorum has a large amount of land that is of high environmental quality, already subject to excessive pressure from the existing population. This high biodiversity interest together with the topography and the local landscape character of winding lanes that meander through much of the area clearly illustrates that the proposals in the draft plan display a lack of understanding of the adverse, irreversible impacts that would result if the proposals were to be implemented.
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11068
<b>Person ID</b>	1268914
<b>Full Name</b>	EDITH HARKINS
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Too much of the Greenbelt is being eroded.
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11071
<b>Person ID</b>	1144903
<b>Full Name</b>	Mr Brian Rook
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11087

<b>Person ID</b>	1262172
<b>Full Name</b>	Janice Boakes
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I believe there are too many large houses planned in both Berkhamsted and Tring. Berkhamsted doesn't have the infrastructure to cope with the intended additional 2200 homes. There is no capacity for new road layouts. There is mention of additional cycle lanes. People living that far from the centre of the town will not cycle they will drive causing congestion in the narrow victorian roads.</p> <p>Parking in the centre of town is extremely difficult. Even with teh new multi-storey car park people look for free parking first.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11090
<b>Person ID</b>	1258923
<b>Full Name</b>	Arthur Barfield
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I would call for fewer houses to be built on green belt land and for the Local Plan to have the climate emergency fully integrated into its targets and objectives. I strongly object to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock, 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 simplistic algorithm.

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I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11103

**Person ID**

1268937

**Full Name**

Mrs Lynette Hyde

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

<b>Comment</b>	<p><b>Vision places &amp; objectives – are the right for the Borough.</b></p> <p><b>No</b></p> <p>The Govt demand for 17,000 houses in Dacorum is based on flawed analysis – DBC’s own and the ONS estimates are well below this figure.</p> <p>The plans were drawn up before the Pandemic which will change all future development</p> <p>The impact of Corona Virus on shopping habits will render Marlowes shopping centre redundant</p> <p>Development of the Green Belt is unnecessary – brownfield sites must be used. The irreversible loss of precious Green fields is contrary to the sustainable growth required to respond effectively to the Climate Emergency.</p> <p>60% of housing within Green Belt land is unacceptable - 850 hectares cannot be justified</p> <p>Hemel North development threatens the Chiltern AONB</p> <p>Over development of Berk by 2,230 dwellings &amp; Tring by 2,730 dwellings will change the character of both towns completely to detriment of all.</p> <p>Insufficient attention to infrastructure if we are to accommodate the huge increase in population.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11107
<b>Person ID</b>	1268939
<b>Full Name</b>	Ms Sylvia O'Brien
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11130

**Person ID**

211222

**Full Name**

Mr Adrian Howe

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

There is a total conflict between the plan to provide a 25% increase in housing resulting in the loss of 2000 acres of green belt and the vision to enhance environmental sustainability with new green spaces. It is ludicrous to imagine both can be achieved. Any green spaces included in the planned developments will just be token gestures due to the density of development planned.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11140

<b>Person ID</b>	1268957
<b>Full Name</b>	Mr Richard Grylls
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11177
<b>Person ID</b>	1264551
<b>Full Name</b>	Mark Somervail
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The plan does not have a section for Northchurch which is a separate village and parish. Northchurch has been included as part of Berkhamsted.</p> <p>The plan will destroy the areas of green belt which separate Northchurch from Berkhamsted and preserve its separate rural identity. Northchurch will be merged into Berkhamsted. The purpose of these areas of green belt was specifically identified in DBC's Emerging Core Strategy of 2017.</p> <p>The population of Northchurch will be doubled and it will cease to be a rural village and lose its historic identity.</p> <p>The plan refers to Northchurch as an urban area. Note that HCC declined traffic calming measures for Northchurch High Street because it is a rural village.</p>

The plan is flawed because 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).

In discussions with other residents of Northchurch I have not met anyone who thinks the plan is right in any way.

The sites between Darrs Lane and Bell Lane and south of Shootersway are adjacent to the Chilterns AONB whose character will be affected.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11195

**Person ID**

1268982

**Full Name**

Mr Andrew Yeomans

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I support the submissions of the Chiltern Countryside Group (CCG) and the Grove Fields Residents Association (GFRA) on this question.

Recognising that growth and change can be beneficial if approached in the most appropriate way for the individual location, I find the Local Plan fails to deliver both this and the DBC's vision statement ( p5 of the Summary). I find the LP contradictory in its identification and selection of large Green Belt sites for development and its vision for existing and future communities and the environment within the Borough.

This revised LP appears to have completely ignored the critical issues identified by CCG & others in 2017, in particular:

- setting figures which DBC identify (LP. 7.7) as 'ambitious' for perceived housing demand within the Borough; housing provision should be based upon need, rather than speculative demand
- release of Green Belt for development without substantive factual reasons demonstrating the 'exceptional circumstances' as required by the National Planning Policy Framework
- reliance on possible Government intentions, rather than statutory obligations. Indeed, the new LP continues to ignore recent strengthening in publicly announced Government policy (December 2020) on urban re-generation, particularly in the North & the Midlands and the need to protect Green Belt.

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - as the main town of the Borough, which has greater existing and potential capacity to support such growth and requisite infrastructure, coupled with better connectivity. It is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth). DBC has failed to make proper robust assessment of brownfield sites within the boundaries for the existing settlements of Tring and Berkhamsted, which it is required to do by Government, before proposing release and development of Green Belt outside present urban perimeters.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring. I do not accept that any delivery and 'mitigation' of a 'comprehensively planned new neighbourhood to the East of the town' could ever 'take into account sensitive views, landscape and protected environmental land'. It is not possible to reconcile construction of an entirely new neighbourhood of 2000 plus houses, with associated schools, shops, roads etc... with the destruction of natural, green open spaces of high quality agricultural land designated as Green Belt and affording key settings for the AONB.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the

existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and well-being of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We welcome creation of these within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. The urban environment of Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted, Tring and the villages would lose the quality of green countryside and access which they already enjoy.

The value of the Chilterns AONB and the Chilterns Beech Woods has not been adequately upheld in significance both to the Borough's residents and to the many visitors for whom they afford essential respite from urban living. The impact of Green Belt development upon the setting of the Chilterns AONB has been minimised.

I believe this Local Plan to be developer led. As such it not only fails to fulfil the vision of DBC but also fails to future-proof the intrinsic character and sustainability of the Borough for its present and future residents.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11222

**Person ID**

**Full Name**

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes  
\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to 'play a much greater role in delivering housing growth' within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has 'delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.' This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built

infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11232

**Person ID**

1262469

**Full Name**

Mark Waters

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Comment</b>	<p>In general terms it would be difficult to challenge these broad objectives. It is all about how, when and where, homes and the number of homes, and supporting infrastructure are delivered.</p> <p>"Conserving and protecting the natural environment", surely does not mean building on the Green Belt in Tring.</p> <p>Doubling the number of houses in Tring surely cannot meet the objective of "ensuring an attractive and valued natural environment."</p> <p>I do not believe Tring's Housing Growth needs, or Dacorum's for that matter can possibly justify doubling the number of dwellings in Tring and building on Green Belt Land in a rural area which is overlapping as it does, with the Chilterns, an area of Outstanding natural beauty.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11235
<b>Person ID</b>	1268990
<b>Full Name</b>	Mr Nick de la Bedoyere
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p>

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11256
<b>Person ID</b>	1268893
<b>Full Name</b>	Mr Martin Hopping
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS11263
<b>Person ID</b>	221884
<b>Full Name</b>	Ms Eliza Hermann
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I disagree with the proposed Vision and Strategic objectives because, despite warm words to the contrary, the proposals place economic growth above all other considerations. This is contrary to National Planning Policy Framework (NPPF) para. 8 which requires Local Plans to give equal weight to</p> <ul style="list-style-type: none"> <li>• economic growth including infrastructure,</li> <li>• social objectives including open spaces and a variety of community services, and</li> <li>• environmental objectives including protecting and enhancing the natural environment, improving biodiversity, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon</li> </ul> <p>The proposed Vision and Strategic objectives give short shrift in particular to the required environmental objectives. The new Local Plan for Dacorum must prioritise protection of the Green Belt, care of the environment, and addressing the Climate Emergency above all else.</p> <p>Dacorum is largely rural with a high quality natural environment and many areas of special designation. Page 19 of the consultation document confirms that 85% of the borough is rural, 60% is Green Belt, and one third of the countryside is within the Chilterns Area of Outstanding Natural Beauty (AONB). Additionally, much of the Chilterns Beechwoods Special Areas of Conservation (SAC) lie in Dacorum, as do three chalk rivers. These facts should form the foundation of any new Local Plan for the borough. The protection and stewardship of these environmental assets is essential.</p> <p>Para. 1.33 of the consultation document lists the key strategic planning matters considered by the Council. There is no mention of the Green Belt, the wider countryside, the environment, nor of the Climate Emergency.</p>

Instead, the proposals amount to a massive building programme. Taken together, the proposals would result in the loss of 850 hectares of green space of which 746 hectares are Green Belt. The result would mean huge areas of car-dependent urban sprawl, changing forever the character of the historic market towns of Berkhamsted and Tring. The Council attempts to justify this by claiming it must meet a central government housing target of 922 dwellings per annum derived from a flawed algorithm and out-dated housing projections. This is illogical and unsound. The Council must take into account the following:

- 1 The most recent 2018 ONS-based housing projections indicate that Dacorum's housing need is around 350 dwellings per annum. Applying the government's "standard method" for calculating housing need would still only produce a housing need figure of 536 dwellings per annum.
- 1 The Council states in its topic papers that 'windfall' housing delivery has averaged 306 dwellings per annum from 2006-2019, and over the past three years from 2017-2019 'windfall' housing delivery has averaged 322 dwellings per annum. Taking into account the impact of the pandemic and of recently expanded permitted development rights it is reasonable to assume further increases in office and retail conversions to residential use, and an even higher 'windfall' housing delivery rate. This rate of housing delivery makes development on Green Belt land unnecessary.
- 1 The NPPF makes clear (para. 11) that sustainable development means meeting housing needs unless policies in the NPPF that protect areas or assets of particular importance provide a strong reason for restricting the scale of development. The NPPF goes on to list the Green Belt, AONBs and SACs among such areas and assets.

Taking these points together, the Council is proposing to utilise out-dated data to justify over-development whilst ignoring the impact of the pandemic and permitted development rights on 'windfall' housing delivery. At the same time, the proposals fail to protect the Green Belt, the Chilterns AONB, the Chilterns Beechwoods SAC, the wider environment and fail to address the Climate Emergency.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11280

**Person ID**

1268994

**Full Name**

Mrs Julie Hopping

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

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The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11294

**Person ID**

1268998

**Full Name**

Mr Philip Hodgson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

* Yes	
* No	
<b>Comment</b>	(no comment)
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11308
<b>Person ID</b>	1269000
<b>Full Name</b>	Mrs Tracey Franklin
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Over-Provision of housing based on inaccurate and superseded data</p> <p>The vision is based on outdated information and as such, exceeds the requirement of housing for the Borough.</p> <p>Climate Emergency Issues</p> <p>By using outdated information, the estimates for housing development are far too high and the use of greenfield land, has a major impact on the environment for the Borough. Put simply, too many houses (that aren't required) will destroy greenfield areas and the subsequent health benefits of such undeveloped lands that are integral to a town the size of Berkhamsted. It will also impact on wildlife in these natural habitats and increase the carbon footprint of the town in a time, when this should be a priority to reduce.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11341

<b>Person ID</b>	1269008
<b>Full Name</b>	Mr Steven Kerry
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><u><i>Vision for Dacorum's Places – Page 23/24</i></u></p> <p>We consider the vision for Dacorum in respect of strategic housing to be inappropriate considering the extent of housing need in the area and the housing delivery issues over the past few years. The vision severely limits development in smaller villages in the Rural Areas. These settlements are the least constrained in the Borough, being located wholly outside the London Metropolitan Green Belt and Chilterns AONB. Such designations wash over the majority of the local authority area but excludes a number of smaller villages.</p> <p>The current strategy will require the release of significant amounts of land from the Green Belt and this is evident in the allocated sites on the accompanying Proposed Policies Map. We therefore consider the stated vision to be a missed opportunity in delivering a greater proportion of development to the less constrained areas of the Borough.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11350
<b>Person ID</b>	221830
<b>Full Name</b>	Mrs Baerbel de la Bedoyere
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

## Comment

*I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.*

*I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.*

*The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.*

*I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.*

*Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.*

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I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files****Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11362

**Person ID**

398597

**Full Name**

Mrs Caroline Freer

**Organisation**

Flamstead Parish Council

**Agent ID****Agent Full Name****Agent Organisation****Yes / No**

No

\* Yes

\* No

**Comment**

Whilst modest increases in housing and supporting services are inevitable, large scale developments all over the borough will significantly reduce the quality of life for many people who have not chosen to live in an even more congested part of the country. Improvements to the infrastructure of the town centre such as Hemel Hempstead, use of brown field sites and development of run down areas are to be encouraged and that is how towns naturally evolve. But to radically increase the population of semi rural areas by imposing out of character and densely built estates will have long term detrimental effects on the borough as a whole. Whilst there may be some "protected" villages in principle - these will still be hugely impacted by the increase in demand for services and the increase in traffic surrounding those villages - on an already congested road network.

**Included files****Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11375

**Person ID**

1207629

**Full Name**

Strategic Planning Department

<b>Organisation</b>	Strategic Planning Department Three Rivers District Council
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Introduction, Para. 1.30-1.38: Working with others.</p> <p>We support progress on the draft Local Plan and recognise the joint working that has been taking place between Dacorum and Three Rivers. It is important to consider and address the cross-boundary issues arising from growth in Dacorum and Three Rivers as both authorities progress their Local Plans; paragraph 1.33 recognises a number of these issues impacting the two authorities, including the potential for unmet housing need arising from Watford, requests from neighbouring authorities to deliver unmet needs, strategic transport issues (on A Roads and Motorways), infrastructure capacity and the need to protect the Chilterns AONB. In terms of meeting unmet needs, TRDC and DBC are in similar positions; Three Rivers is heavily constrained by Green Belt and has its own extremely high housing target to meet. As explained in a letter from TRDC dated May 2020, there is a very significant shortfall between the potential housing capacity of Three Rivers' previously developed land and the level of identified need and a clear deficit of land required to meet employment needs over the plan period, and therefore Three Rivers is unable to assist in accommodating any growth shortfall identified in Dacorum. It is however recognised that Dacorum is planning to meet its own objectively assessed need for housing and that St. Albans City and District Council can assist in providing 84,000sqm of office floorspace and 80,000 sqm of industrial floorspace towards DBC's employment needs. It is noted from ongoing duty to cooperate discussions that whilst the specific district-level floorspace figures identified in the Economic Study Update may not be met in individual authority areas, employment needs are expected to be met across the FEMA; it is important that the SW Herts authorities continue to discuss employment needs across the FEMA as the Councils' Local Plans progress and to regularly update calculations in light of any new employment commitments that may come forward.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11395
<b>Person ID</b>	1269021
<b>Full Name</b>	RUPERT SELDON
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>we object to the Dacorum Plan 2020 – 2038 for the following reasons:</p> <ol style="list-style-type: none"> <li>1 The loss of 2,000 acres of green belt in the midst of a climate crisis is a short-sighted decision. The loss of this habitat will be</li> <li>2 The draft plan has underestimated the potential from brownfield development – the vast majority of the development is proposed for green belt</li> <li>3 The plan is based on superseded housing targets – the current 2018 targets from ONS imply that only 500 houses a. are needed whereas the plan uses the 2014 targets and a rate of 1,000 houses</li> </ol> <p>p.a. This is a fundamental issue with the validity of the draft plan and if this is not rectified very significant harm will be caused to the environment in the borough.</p> <ol style="list-style-type: none"> <li>1 The implications of the COVID pandemic or HS2 have not yet been considered, as both will reduce the need for houses in the commuter belt around</li> <li>2 The level of housing proposed will overwhelm the existing infrastructure – roads and utility services will need significant investment. Existing roads passing through the centre of Berkhamsted and joining Berkhamsted to the M1 will become much busier and will completely change the character of the area. Areas such as Piccotts End will be swallowed up in the new development along the Link Road to The character will be irreversibly harmed.</li> <li>3 Services will need to be increased – however in recent years services such as busses have been To date this has resulted in more individual journeys by car and more congestion and pollution.</li> <li>4 No social housing appears to have been included in the</li> </ol> <p>We recognise that more housing is needed in the borough, however we consider that the scale and irreversible damage that will be caused as a result are both unacceptable. We support development of brownfield sites but would not want to see the removal of protection of greenbelt from future development until a more up to date assessment of need at brownfield potential has been explored.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11399
<b>Person ID</b>	1262227

<b>Full Name</b>	James White
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The current vision and strategic objectives of the Local Plan, particularly the housing aspect and the concomitant impact on Green Belt land, are objectionable in their own right, but have become even more so due to the historic events of the past year, namely Brexit and Covid.</p> <p>The impact of both the pandemic and leaving the EU cannot be overstated in terms of how they change the use and requirements of our towns and villages and, more importantly, their open spaces. The long term impact of these two dramatic events on housing need (presumably much reduced due to the dramatic fall in immigration), demand for locally produced food (good in terms of reducing our reliability on imports and also on reducing our CO2 emissions), empty office space (which is unlikely to be required any time soon and so could be re-purposed for housing) and the desire for natural green open spaces, critically undermines the evidence base upon which the Plan has been devised. Whilst the Council is clearly keen to sign off the Local Plan and the Borough's residents are entitled to know what the future holds for their area in terms of development, surely events such as these, with the far-reaching effects they have already brought about, need to be included within the planning and may even enable difficult decisions (such as the allocation of Green Belt land to development) to be overturned.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11405
<b>Person ID</b>	1269022
<b>Full Name</b>	JENNI WHITE
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The current vision and strategic objectives of the Local Plan, particularly the housing aspect and the concomitant impact on Green Belt land, are objectionable in their own right, but have become even more so due to the historic events of the past year, namely Brexit and Covid.</p> <p>The impact of both the pandemic and leaving the EU cannot be overstated in terms of how they change the use and requirements of our towns and villages and, more importantly, their open spaces. The long term impact of these two dramatic events on housing need (presumably much reduced due to the dramatic fall in immigration), demand for locally produced food (good in terms of reducing our reliability on imports and also on reducing our CO2 emmissions), empty office space (which is unlikely to be required any time soon and so could be re-purposed for housing) and the desire for natural green open spaces, critically undermines the evidence base upon which the Plan has been devised. Whilst the Council is clearly keen to sign off the Local Plan and the Borough's residents are entitled to know what the future holds for their area in terms of development, surely events such as these, with the far-reaching effects they have already brought about, need to be included within the planning and may even enable difficult decisions (such as the allocation of Green Belt land to development) to be overturned.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11411
<b>Person ID</b>	1269023
<b>Full Name</b>	DOUG DUNN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	DBC overstates the housing need.

Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.

Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase

the number of homes they plan for to support local economic growth."

There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.

A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.

Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.

DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11419

**Person ID**

1269025

**Full Name**

JOHN MAWER

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

* Yes	
* No	
<b>Comment</b>	<p>1 <b>Borough Vision</b>  A vision is bound to be idealistic. It is hard to disagree with any aspect of this. (My experience is of LA3, where the vision and policy do not match what has been produced.)</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11433
<b>Person ID</b>	1264362
<b>Full Name</b>	Juliet Miller
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	<p><b>Climate Change Emergency</b></p> <p>The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.</p> <p>The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.</p> <p>The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home</p>

electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11456

**Person ID**

1261429

**Full Name**

Douglas Fisher

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>It would be a very good thing for the Borough if this vision could be achieved.</p> <p>However, to do this some policies will need major changes , such as allowing Tring in particular but all settlements to retain "their separate and distinctive identities" and the natural beauty of the Chilterns AONB to at least be preserved, even if the vision of enhancing the AONB proves impossible.</p> <p>DM27 is in keeping with the vision but meeting its requirements would rule out the 3 major Tring sites. In fact even a modest development in any of these areas would affect the setting of the AONB and ought to be refused planning permission under DM27 2 a), c) and f)</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11469
<b>Person ID</b>	1262872
<b>Full Name</b>	Fiona Trinder
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I believe the number of houses that have been recommended has been based on an outdated formula and therefore the actual required based on updated analysis is far less.
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11491
<b>Person ID</b>	865014
<b>Full Name</b>	Mr Robert Turnbull
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to play a much greater role in delivering housing growth within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS11499
<b>Person ID</b>	1269116
<b>Full Name</b>	Mr & Mrs S & J Ballantyne
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Vision and strategic objectives are generally OK but the size and nature of delivery are unsupportable.</p> <p>We understand that there is a requirement across the land for new housing and believe Dacorum can take part in that. However, development must be in sustainable locations, be committed to high standards of design and contain significant provision of smaller and affordable housing - this area suffers from new housing being large 4 - 5 bed homes and expensive which is exactly what it doesn't need to promote sustainable growth and and keep the town alive.</p> <p>The requirement to make sure the character of the countryside is enhanced, admired and cherished is a good one but it appears to be at the cost of large swathes of Green Belt and particularly in Tring which seems to have a disproportionate allocation of development and disproportionately on Green Belt also affecting the Area of Outstanding Natural Beauty.</p> <p>The idea that you can deliver "a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites" is a complete nonsense because it's all Green Belt land and by definition will NOT be protected because it will be built on!</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11510
<b>Person ID</b>	1269117
<b>Full Name</b>	ANITA PARRY
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11521

**Person ID**

1269119

**Full Name**

JENNIFER BLOGG

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11538
<b>Person ID</b>	1269120
<b>Full Name</b>	JANE VELLACOTT
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The vision seems contradictory and confused:</p> <ul style="list-style-type: none"> <li>• refers to same areas being Green Belt but implies urban eg Northchurch</li> <li>• policy on village protection and then ignores it in respect of Northchurch</li> <li>• DBC wants to build on Green Belt but intent on enabling more green space</li> <li>• provides a mitigation argument but then offers them out of area</li> </ul>

- recognises that Dacorum is characterised by its Green Belt but no evidence of liaising with its more highly developed neighbouring authorities to help
- ignores one of its own referenced reports that building plans do not need to be increased to support economic growth: South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), a study by G.L. Hearn and covers neighbouring councils such as Albans as well as Dacorum, page 5.

in February 2020 it was identified that there was a housing backlog with there being more than a million homes with planning permission that had not been built. DBC should reset their plans, leave green belt alone and resolve these issues first. The plan would benefit being over a far shorter period to allow the effects of Brexit and the current pandemic to bed down and to see if the 1+ million people who have left the UK return.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11543

**Person ID**

1149269

**Full Name**

Harriet Twigger

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**Comments on the New Dacorum Local Plan 2020-2038**

Dacorum Borough Council (“DBC”) has invited its residents to submit comments on the New Dacorum Local Plan 2020-2038 (“the Local Plan”).

I am writing to say that I am very concerned about the proposals set out in the Local Plan, particularly the excessive housing development planned for North Hemel (Phase 1).

The amount of housing required seems to be completely out of proportion to local requirements and according to the countryside charity CPRE (Campaign to Protect Rural England) Hertfordshire the plan has been calculated on outdated data from 2014.

The continued concentration of house building in the South East also seems to be at odds with the current Government's expressed desire to "level up".

I have seen nothing in the Local Plan that convinces me that there are "exceptional circumstances" that justify building on green belt land and a nationally important area of natural beauty.

The River Gade is a chalk stream, a globally rare and vulnerable habitat. As the Herts and Middlesex Wildlife Trust says: "Chalk streams are the UK's equivalent to tropical rainforests. They support a huge variety of rare and vulnerable wildlife. Some of our most iconic and well-loved species like the Water Vole, Wild Brown Trout and Mayflies, depend solely on these rivers to survive in Hertfordshire."

The upper section of the High Gade Valley lies in the Chilterns Area of Outstanding Natural Beauty ("Chilterns AONB") and is protected. However, it is extremely important that the section of the Gade Valley, which lies between the Chilterns AONB and north Hemel Hempstead, is also protected for future generations.

DBC, itself, has identified this as an important local habitat to conserve and strengthen. The 2004 DBC paper "Landscape Character Assessment of the High Gade Valley", recommends the following policies (amongst others) in relation to this area:

- restrict further built development within the valley and develop a strategy for mitigating existing
- resist development that could lower the water table within river valleys and affect wetland
- promote the expansion of woodland ... and hedgerow

It seems that, not only is DBC now proposing to build 1,550 houses in this area, but it also plans to turn part of this beautiful habitat into a recycling and refuse depot.

The amount of new housing will put immense pressure on local infrastructure, especially water supply. Over-abstraction of water is a significant threat to chalk streams and the surrounding environment. As noted above, this risk factor was identified by DBC in 2004.

DBC is drafting an Infrastructure Development Plan to explain how the increased demand for water will be met and also how the other pressures on local infrastructure will be met. However, it seems that the answers are not currently available. It cannot be right that the Local Plan should be approved, without solutions to such fundamental issues having been identified.

George Eustice, the Environment Secretary has expressed Central Government's concern to "front-load ecological considerations in the planning development process". As, he said on 20 July 2020: "This Government's pledge is not only to stem the tide of loss, but to turn it around - to leave the environment in a better state than we found it."

I would like to see DBC do more to put this Government pledge into action and to protect our environment. An important step towards this would be to withdraw the proposed Local Plan for North Hemel.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11547

**Person ID**

1269122

**Full Name**

KATHRYN WHITTLE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way

that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring. Furthermore, such extensive development on green belt land which borders the AONB will impact the habitats and wildlife which currently inhabit this area. One example being the butterfly habitats

located just inside the AONB beside TR2 and TR3. Building work and the traffic, noise and associated disruption alone could cause irreparable damage to these habitats before we take into account the significant encroachment that the new housing and businesses will make.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built

infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11558

**Person ID**

1269123

**Full Name**

KENTON WHITTLE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

## Comment

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11585

**Person ID**

1269146

**Full Name**

MAXWELL CLIFTON

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

<p>* <b>Yes</b> * <b>No</b></p>	
<p><b>Comment</b></p>	<p>DBC overstates the housing need.</p> <p>Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.</p> <p>Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."</p> <p>There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.</p> <p>A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.</p> <p>Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.</p> <p>DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.</p>
<p><b>Included files</b></p>	
<p><b>Consultation Point</b></p>	<p>Borough Vision to 2038</p>
<p><b>Comment ID</b></p>	<p>EGS11591</p>
<p><b>Person ID</b></p>	<p>1269148</p>
<p><b>Full Name</b></p>	<p>SIMON AND ANNA BARNARD</p>
<p><b>Organisation</b></p>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>This is very disappointing and unimaginative, merely advocating 'more of the same' rather than setting out a NEW vision for the area. The so called 'overarching vision' is based purely on vast amounts of development with scant regard to effects of the development on existing settlements and residents and the effect on the character and setting of the Chilterns Area of Outstanding Natural Beauty.</p> <p>The Plan is unsuitable as it proposes excessive development with insufficient environmental safeguards. Little is said about mitigating the excessive loss of Green Belt land, how it will increase biodiversity and how it will meet National and Hertfordshire's goals for climate change.</p> <p>It fails to take into account the Government's reconsideration of housing numbers and the effect of Covid 19 on how people live and work.</p> <p>It is premature and unsound and is full of vague and meaningless statements such as 'as far as possible', 'take into account' etc. These mean nothing and merely shows little commitment to a robust protection of the countryside and the existing settlements and residents.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11618
<b>Person ID</b>	1158198
<b>Full Name</b>	JACK ARMSTRONG
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	(no comment)

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11646
<b>Person ID</b>	1269150
<b>Full Name</b>	Mrs Helena Parr
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>No I do not think the over-arching vision contained in the plan is the right for the Borough. I believe the plan severely over-estimates the number of houses required, as it is based on out of date ONS data, and as a result is planning to increase the size of these small towns to such an extent without giving enough thought to the impact of these developments on local infrastructure, environmental issues and on local residents.</p> <p>The plan does not protect the greenbelt areas surrounding the towns (especially Berkhamsted) and destroys existing natural habitats. Dacorum Borough Council has declared a climate emergency and indicated this should be a central pillar in any future plans of the borough - I do not see how removing significant areas of greenbelt land can be inline with this policy.</p> <p>The proposal in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these small historic market towns.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11657
<b>Person ID</b>	1269152
<b>Full Name</b>	SIMON RHEAD
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11670

**Person ID**

1269212

**Full Name**

PETER SCOTT

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p><b>Climate Change Emergency</b></p> <p>The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.</p> <p>The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.</p> <p>The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.</p> <p>In addition to the Enviro-Tech aspirations in the plan we wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders &amp; installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11703
<b>Person ID</b>	1269217

<b>Full Name</b>	Mr David Hulse
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This</p>

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11718

**Person ID**

1152494

**Full Name**

MRS G RUSSELL

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Many of the objectives mentioned here are not carried through in the Plan.  A few points:  Re 2.2: Climate Change Strategy – very little of substance in the plan to address climate change.  Re 2.3: Housing Growth: Growth has been prioritised over numerous environmental obligations and considerations. The Plan places too much emphasis on aspirational growth strategies and partnerships which have not been subject to public consultation.  Re 2.23: “some development of greenfield sites, including sites within the Green Belt” is a massive understatement. About three quarters of the proposed new housing is in the Green Belt.  Re 2.24 – re market towns Berkhamsted and Tring: These cannot play such a major role as proposed in the Plan.  Re 2.24 – re protecting the character of the wider countryside ....:  This is definitely not being done in the Plan.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11738
<b>Person ID</b>	1269230
<b>Full Name</b>	CHARLES GABRIEL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	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**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11749

**Person ID**

1269233

**Full Name**

CIARA KENT

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11770
<b>Person ID</b>	871625
<b>Full Name</b>	Mrs Clare Francis
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11771

**Person ID**

1269235

**Full Name**

Miss Eleanor Smith

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

<b>Comment</b>	<p>DBC overstates the housing need.</p> <p>Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.</p> <p>Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."</p> <p>There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.</p> <p>A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.</p> <p>Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.</p> <p>DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11786
<b>Person ID</b>	1264468
<b>Full Name</b>	Melanie Parr
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11797
<b>Person ID</b>	1269243
<b>Full Name</b>	HARRIET MESHER
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes

<b>Comment</b>	I feel that the overarching vision is the right one for Dacorum, however the scale in which this is being proposed is far too big. Especially for a smaller market towns like Tring. Development of areas is of course necessary, but needs to be done sympathetically, both in terms of environmental aspects and protecting Green Belt, and in terms of keeping the feel and functionality of the town in terms of having the right number of people for its size and infrastructure.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11803
<b>Person ID</b>	1269244
<b>Full Name</b>	GAVIN BAYLISS
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	I feel that the overarching vision is the right one for Dacorum, however the scale in which this is being proposed is far too big. Especially for a smaller market towns like Tring. Development of areas is of course necessary, but needs to be done sympathetically, both in terms of environmental aspects and protecting Green Belt, and in terms of keeping the feel and functionality of the town in terms of having the right number of people for its size and infrastructure.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11823
<b>Person ID</b>	350823
<b>Full Name</b>	Mrs Sue Yeomans
<b>Organisation</b>	Chairman Chilterns Countryside Group
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I support the vision but do not find the strategic objectives and the proposed Local Plan fulfil that vision. I fully endorse the response of the Chiltern Countryside Group to this question.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11833
<b>Person ID</b>	1262872
<b>Full Name</b>	Fiona Trinder
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I believe the number of houses that have been recommended has been based on an outdated formula and therefore the actual required based on updated analysis is far less.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11858
<b>Person ID</b>	1170330
<b>Full Name</b>	Jorn Peters
<b>Organisation</b>	Senior Strategic Planner Greater London Authority
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Comment</b>	Thank you for the opportunity to respond to this consultation.

Thank you for the opportunity to respond to this consultation.

Thank you for the opportunity to respond to this consultation.

We support the closer collaboration with the authorities in South West Hertfordshire and in particular the preparation of a Joint Strategic Plan. We also welcome a coordinated approach to growth and development with St. Albans City and District at Hemel Hempstead.

In terms of demographic projections, please note that the GLA uses alternative population and household projections that have consistent outputs for all local authorities in England. They are available on the London Datastore: <https://data.london.gov.uk/demography/population-and-household-projections/>

We continue to be open to exploring strategic collaboration opportunities across the Wider South East. The Borough is located within the Strategic Infrastructure Priority 'Midlands and West Coast Mainline (London – Luton – Bedford / Milton Keynes)' (see Policy SD3 and Figure 2.15). This has been endorsed by the Wider South East partnership, and the Council may wish to reflect on its strategic opportunities in the emerging Local Plan.

Please note that the new London Plan will be formally published on 2 March 2021. The latest information are available on our website: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan>.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11859
<b>Person ID</b>	1269274
<b>Full Name</b>	RAFFAELE MERCURIO
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS11863
<b>Person ID</b>	1269275
<b>Full Name</b>	KALLIOPI KOUTSOU
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Hello my name is [XX]; I live in Tring and my address is [XX] and I would like the council to consider the following points as I object to the council vision plans:</p> <p>Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11883
<b>Person ID</b>	1269277
<b>Full Name</b>	DEFINE PLANNING AND DESIGN LTD
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>The following representations are submitted on behalf of the Stanbridge Family and Bloor Homes Ltd (who combined are referred to herein as “BHL”) who welcome the preparation of the Dacorum Borough Local Plan Review (LPR) and support the intention to positively plan for sustainable development and growth in the District over the plan period. The specific comments in relation to the Emerging Strategy for Growth (ESFG) reflect BHL’s land interests in the wider Hemel Garden Community area and the relevant matters highlighted in relation to the delivery of that significant opportunity as summarised below.</p> <p><b>CONTEXT AND BOROUGH VISION TO 2038</b></p> <p>BHL notes DBC’s recognition that the ongoing LPR “<i>gives us the chance to grasp opportunities and build for the future.</i>” Indeed, the positive approach taken to “<i>responding to, planning for, and managing change</i>” accords with both the central tenets of the National Planning Policy Framework (NPPF) and the Government’s intentions to accelerate the delivery of housing.</p> <p>The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has interdependent economic, social and environmental objectives (paragraphs 7 and 8). At the NPPF’s heart, therefore, is a presumption in favour of sustainable development (paragraph 10) that requires Local Plans to “<i>positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change</i>” (paragraph 11).</p> <p>In that context, BHL strongly supports the intention for DBC to meet as much of the Borough’s objectively assessed needs as possible (paragraph 1.37), which requires the Council to significantly increase the supply of land in the Borough. That being said, however, BHL questions the quantum of the Borough’s minimum objectively assessed needs, as outlined below.</p> <p>Furthermore, BHL supports the recognition by DBC that a step change in housing delivery is necessary, given that the proposed housing requirement is more than double the requirement within the previous Core Strategy. To achieve that, paragraph 4.4 sets out the strategy for guiding development at this level, which specifically “<i>focuses growth in and around the most sustainable settlements in the Borough, principally Hemel Hempstead, Berkhamsted and Tring through utilising urban land as well as through <u>extensions to each settlement.</u></i>”</p> <p>This broad approach to the spatial distribution of growth is supported by BHL and is underpinned by an evidence base that highlights the suitability of land to the north of Hemel Hempstead for large-scale development. As such, BHL supports the decision to “<i>release additional land from the Green Belt around Hemel Hempstead</i>”, both to meet the Borough’s</p>

development needs and to support the unique and transformational opportunity presented by the Hemel Garden Communities programme.

Furthermore, BHL supports the recognition by DBC that a step change in housing delivery is necessary, given that the proposed housing requirement is more than double the requirement within the previous Core Strategy. To achieve that, paragraph 4.4 sets out the strategy for guiding development at this level, which specifically “*focuses growth in and around the most sustainable settlements in the Borough, principally Hemel Hempstead, Berkhamsted and Tring through utilising urban land as well as through extensions to each settlement.*”

This broad approach to the spatial distribution of growth is supported by BHL and is underpinned by an evidence base that highlights the suitability of land to the north of Hemel Hempstead for large-scale development. As such, BHL supports the decision to “*release additional land from the Green Belt around Hemel Hempstead*”, both to meet the Borough’s development needs and to support the unique and transformational opportunity presented by the Hemel Garden Communities programme.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11902

**Person ID**

1269313

**Full Name**

Mrs Rachel Martinek

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><b><u>Vision</u></b></p> <p>1 <b>The Emerging Strategy does not deliver its own vision</b>, in two key respects:</p> <ul style="list-style-type: none"> <li>• The entire approach is antithetical to the stated aim that <i>"The natural beauty of the Chiltern Hills and the varied character of the countryside will have been enhanced"</i> (<u>specific comments and evidence are set out below</u>);</li> <li>• The principles (LP5.2) include inter alia <i>"Minimising and managing the requirement for development on Green Belt land / impact on AONB"</i>. There is no evidence that the Emerging Strategy attempts significantly to do this: there are only platitudes (<u>see specific comments below</u>).</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS11926
<b>Person ID</b>	1269347
<b>Full Name</b>	Rebecca Braybrooks
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I am writing to object to the local plan developments on the following grounds.</p> <p>I do not agree that 16,000 houses should be in the plan you should be using up to date figures which would halve that number to around 8,000 houses.</p> <p>This 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>The green belt land such as Rectory Farm helps protect the shape, size and character of towns and villages like Kings Langley and prevents them merging into one another.</p>

The plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home.

Your plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses.

We don't have enough water to supply all the extra houses. It is a fact 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.

Please reconsider this local plan and do not decimate the beautiful villages we have here.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS11953

**Person ID**

1269350

**Full Name**

Jan Dent Safer Gravel Path Action Group

**Organisation**

SECRETARY  
Safer Gravel Path Action Group

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Borough Vision – The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected.

The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS11965

**Person ID** 1269352

**Full Name** Walid Youssef

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** I would like the council to consider the following points as I object to the council vision plans:

Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Sneutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

**Included files**

**Consultation Point** Borough Vision to 2038

<b>Comment ID</b>	EGS11966
<b>Person ID</b>	1264526
<b>Full Name</b>	Peter King
<b>Organisation</b>	Water End & Upper Gade Valley Conservation Society
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p><b>Absolutely Not.</b></p> <ul style="list-style-type: none"> <li>• <b>General</b></li> </ul> <p>The Water End and Upper Gade Valley Conservation Society is an organisation set up some 30 years ago by naturalist the late Gordon Beningfield to promote conservation in the Upper Gade Valley and which is a unique area of outstanding natural beauty.</p> <p>The proposed developments to the North West of Hemel Hempstead border the hamlet of Water End which is in the ANOB. The Society is therefore primarily concerned with the effect of this part of the development but it is concerned by the impact all the developments will have on this area.</p> <ul style="list-style-type: none"> <li>• <b>Use of Green Belt Land</b></li> </ul> <p>The Society objects most strongly to the widespread use of green belt land for building as is proposed in the Plan. Furthermore much of the development in the northwest of Hemel Hempstead and which borders the ANOB is arable farmland. This land has been farmed for generations and there is no way our community should be losing this agricultural input to the economy. There is on this land, a well established eco structure for both flora and fauna and which is linked to that in the neighbouring Upper Gade Valley. The wild life that is there now would have to move elsewhere. The taking out of this farm land would lead to greater transport movements of food and hence impact unfavourably on climate change.</p> <ul style="list-style-type: none"> <li>• <b>Transport &amp; Infrastructure</b></li> </ul> <p>The Plan inadequately assesses the impact of transport through the Upper Gade Valley resulting from the proposed developments. The B440 Road has been the subject of extensive studies over the years because of the volume of traffic it carries and its suitability for the modern day traffic. A weight restriction has recently been imposed on the bridge at Water End and that has had an impact on the volume of HGV's using it. The Society believes that this scale of development will lead to a much heavier use of this artery and which will have a significant impact on the sustainability of the AONB.</p>

Both the bridges in Water End are Grade II listed, a fact not considered by the planners. Most of the properties bordering the B440 in Water End are Grade 11 listed.

- **Natural Environment**

Running through the middle of the Valley to the North West of Hemel Hempstead is a river and a highway. They follow the natural features of the land

The River Gade is a natural chalk stream river of which there are relatively few in the whole of the UK. The Conservation Society believes it is essential that this part of our heritage is not damaged, yet alone lost. In our view the proposed developments will have a devastating effect on the Valley as a result of overuse, overextraction and pollution. One cannot bring in this number of persons permanently into such an area without a significant impact.

These proposals go directly against what eminent naturalists such as Sir David Attenborough are warning against. There has to be a balance between humans and nature and the impact of this Plan goes totally against it.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12000

**Person ID**

1161359

**Full Name**

D B Land and Planning

**Organisation**

D B Land and Planning

**Agent ID**

1161362

**Agent Full Name**

Nathan  
McLoughlin

**Agent Organisation**

McLoughlin Planning

**Yes / No**

No

\* Yes

\* No

**Comment**

Paragraphs 2.1 and 2.2

DBLP recognise that these two paragraphs set out the fundamental conflict that the Plan has to address, in that a climate change emergency has been declared at the same time the Borough faces a requirement to accommodate 1,023 dwellings per annum as part of the Government's revisions to the Standard Method. Central to the climate emergency is the Council's Climate Change Strategy and DBLP recognise the role of the Local Plan plays in delivering the aims set out in that Strategy. In so doing, DBLP wish to ensure that the Council's focus on meeting its housing requirements are not sacrificed in order for Climate Change Strategy to be met. The Local Plan's Development Strategy offers a very real opportunity for sustainable patterns of development to be promoted, whilst meeting housing needs.

Paragraphs 2.3 to 2.5

DBLP support the recognition in these paragraphs that the Borough is delivering a significant step change in the overall housing growth. The the previous iteration of the Local Plan was proof finding for circa. 576 dwellings per annum whereas the Standard Method now requires 1,023 dwellings per annum. In addressing this need, DBLP equally welcome the Plan's recognition that high average house prices in the Borough has made the ability for people to buy market housing increasingly difficult.

Managing this chance – paragraphs 2.21 to 2.25

DBLP support the recognition that there is a need to accommodate growth in the Borough across the lifetime of the Plan, and in particular, there is a requirement to develop in the Green Belt. It is considered that there are exceptional circumstances (as required by paragraphs 136 to 138 of the Framework) to release land from the Green Belt for housing development and this will be explored later in this Statement.

Borough Vision to 2038

DBLP support the overarching Vision for the Borough as set out on Page 22 of the document. However, the Vision for housing development should be further reinforced by making reference (either in the first or second paragraphs) to meeting the requirements of the Standard Method, so it is beyond doubt that this Plan is making a positive statement and commitment to deliver the housing required as by Standard Method.

Turning to the Vision for Markyate on Page 24, there is a need to recognise that market housing will equally be provided in Markyate as well as affordable homes. It is recommended that the Vision is adjusted accordingly to make reference to both open market and affordable homes (first bullet point).

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12002

**Person ID**

1269353

**Full Name**

TESSA BARFIELD

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I would call for fewer houses to be built on green belt land and for the Local Plan to have the climate emergency fully integrated into its targets and objectives. I strongly object to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock. 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 simplistic algorithm.

The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects.

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, as recommended by national planning guidance. This draft Local Plan fails to demonstrate a pathway to local zero carbon or enhancements to biodiversity. The plan is unambitious and does not commit to any level of sustainability in its sustainability targets. The proposed plan has clearly prioritised house building growth over considerations for the climate emergency.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovington, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12027

**Person ID** 1207341

**Full Name** Mr Adam Wood

**Organisation** 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  
\* Yes  
\* No

**Comment** In these sections the ESG continues to drill down towards the detailed policies which will underpin the eventual Local Plan. We consider these are entirely appropriate objectives to pursue, as they represent a dynamic approach which will signpost the way to the policy detail.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12034

**Person ID** 1269358

**Full Name** Mr Tim Duggleby

<b>Organisation</b>	Associate Director Redevelopment Programme West Hertfordshire Hospitals NHS Trust
<b>Agent ID</b>	1269359
<b>Agent Full Name</b>	Mr Tom Rudd
<b>Agent Organisation</b>	BDP
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	West Hertfordshire Hospitals NHS Trust supports the overarching vision, vision for Dacorum's places and the strategic objectives contained within the Emerging Strategy for Growth, including the promotion of healthy and sustainable communities which is consistent with paragraph 20 of the NPPF. Noting that the vision for Hemel Hempstead includes the provision of "new health care facilities and other community and residential uses on the regenerated hospital site", the Trust confirms its intention to continue to provide acute healthcare services from the Hemel Hempstead Hospital site as a fundamental part of its strategy for the future provision of acute services to the population of West Hertfordshire. The strategy also recognises that the redevelopment of the current site provides the opportunity to release surplus land, potentially for residential development.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12040
<b>Person ID</b>	1269361
<b>Full Name</b>	Dr Freya Rumball
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	DBC overstates the housing need.

Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.

Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."

There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.

A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.

Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.

DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12046

**Person ID**

330363

**Full Name**

Mr. Graham Lay

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Whereas the Borough needs to grow organically, this strategy or 'vision' seems to expect a more rapid growth in the Borough than has ever been seen before. It copies the same mistakes of the past of building to provide jobs for builders, profit for developers, taxes for the government and depletion of green spaces without much real consideration for the residents of the Borough.

This consultation has not considered the comments made in the past.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12054

**Person ID** 1264202

**Full Name** Philippa Wosiek

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** The Local Plan needs to be updated after the unprecedented COVID19 pandemic. The Local Plan proposals put forward were written either before or during the first 10 months of the pandemic and now need to be reviewed in line with how our community has had to adapt. An updated Plan should then be put out to consultation which truly reflects what is required going forward. Asking the community to comment on a Plan which is clearly out of date and as I understand it, under Regulation 18 this is the only time that local residents will be allowed to have any say on their own environment.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12073

**Person ID** 1269372

**Full Name** MATTHEW SPEED

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built

infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12085

**Person ID**

1269386

**Full Name**

KERR LINDA

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

<b>Comment</b>	<p>The objectives are laudable, but the delivery is what counts.</p> <p>Without the requirement from Central Government, it is debatable whether the scale of the proposed development would ever have been contemplated by Dacorum.</p> <p>The pressure from Government means that the cohesion of established communities is now going to be completely disrupted, both physically by development and socially by significant increase in population.</p> <p>For a rural town like Tring, an additional 2,700 homes means a potential population expansion of at least 50%. This equates to a small "new town" within the existing town.</p> <p>The siting of these new properties on agricultural land is in contradiction with the objective to preserve and protect the natural environment.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12099
<b>Person ID</b>	1145854
<b>Full Name</b>	Mrs Deborah Doughty
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to

build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring as well as over development in the town centre.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

Building in the centre of town would be a mistake and cause overcrowding and traffic chaos in our historic streets as well as increased pollution levels.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12115

**Person ID**

1269413

**Full Name**

Mr Chris Wallis

**Organisation**

Hon. Director of Development  
Tring Sports Forum

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

1 The Plan Context & Challenges  
Consultation point VIS

No comment directly relating to sport & leisure matters.

### 1 Borough Vision to 2038

3.1 – 3.5 TSF consider the text of both plans to 2025 and 2050 to be admirable, but challenging. By working together with the various Local Authorities and other stakeholders on the Masterplan preparation for Tring, it believes that a better solution than that proposed here to obtain the themes mentioned in both plans, will be achieved. It should not be forgotten that over 15 years TSF have carried-out a number of surveys of the local population and have prepared various draft plans in conjunction for discussion purposes, so have a very real understanding of what will be acceptable to the residents in general and to organisations equally as intent as TSF to ensure that all future development is environmentally acceptable.

3.6 'The Vision for Dacorum's Places – Tring' promotes the sports/leisure facilities proposed to the 'east of the town.' Without going into the details here but later in the document, we believe that for many reasons the main sports hub area should be a combination of the two existing sports hubs, (i.e. The Pendley Sports Centre & the Tring Park Cricket Club/Tennis/Hockey Clubs area,) linking the two with further playing fields in the north of the proposed Dunsley Farm site. Should a 55% increase or similar in the number of new homes in Tring as currently planned be adopted, then it is accepted that further land will need to be allocated, but the importance of the existing sports clubs to Tring should be emphasised.

There are obvious reasons why the Tring Anglers (and the Tring Canoe Club) also need access to water, river or reservoir, with adequate parking provision.

#### Included files

#### Consultation Point

Borough Vision to 2038

#### Comment ID

EGS12138

#### Person ID

1269413

#### Full Name

Mr Chris Wallis

#### Organisation

Hon. Director of Development  
Tring Sports Forum

#### Agent ID

#### Agent Full Name

#### Agent Organisation

#### Yes / No

No

\* Yes

\* No

#### Comment

Referring toTring matters only, we feel that too much lip-service is being paid to the major landowners. Many elements of the proposed Plan are poorly sited for the reasons given and others relating to the CAONB, as described by others.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12144
<b>Person ID</b>	1160677
<b>Full Name</b>	Mr Paul Doughty
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to " play a much greater role in delivering housing growth " within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

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The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS12159
<b>Person ID</b>	1269444
<b>Full Name</b>	Mr & Ms Jim & Katie Barnard & Partridge
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><u>Do you think the overarching vision and strategic objectives are right for the Borough?</u></p> <p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12174
<b>Person ID</b>	1269448
<b>Full Name</b>	Mr John Mardell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	I think that the number of houses is too high. There doesn't seem to be joined up thinking concerning the support services and facilities that are required. Not enough 'planned' for schools, doctors, hospitals, roads, gas, electric, water, council services, etc...
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12183
<b>Person ID</b>	399285
<b>Full Name</b>	Mr John Roberts
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Reference the proposed Local Plan -</p> <p>I disagree with these proposals for the Local Plan and the housing numbers proposed.</p> <p>To build even more houses in Berkhamsted and especially along Shootersway and Kingshill Way will be disastrous!</p> <p>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.</p> <p>The impact on the infrastructure, increased pollution, increased congestion in Berkhamsted which is already gridlocked at peak traffic flow times and will therefore continue to give major road safety concerns.</p> <p>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>

Therefore I totally disagree with the Dacorum Local Plan 2020 to 2038 and the Key Developments in Berkhamsted.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12194

**Person ID** 1145481

**Full Name** Mr Brian Kazer

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** The overall number of houses at 16,899 (para 7.7 table 2) is substantially in excess of ONS projections 2018. Whilst the MHCLG PPG Guidance requires the use of 2014 projections, it is profoundly disappointing that DBC does not appear to have robustly challenged this.

Policy SP 2. The housing requirement for Tring (at least 2,700) is grossly unfair being 16% of the total for DBC when Tring's population is less than 8% of Dacorum population. This seems to be developer led based on land available to east of Tring, but there is no meaningful assessment at all on the impact on, inter alia, resulting traffic congestion in Tring as a consequence of such growth with the number of cars likely to increase by around 5,000 (based on current car ownership levels), parking provision, the fact that Tring station car park is already full to capacity by 8 am (before Covid pandemic and likely again from end of 2021), parking problems even before this building at local attractions eg Tring reservoirs & Tring Park etc.

Section 1.30 "Working with Others" (Page 9)

This section notes the importance of cross-boundary matters. However there appears to be no reference to any discussion with Aylesbury Vale District Council or Buckinghamshire County Council, despite Tring being bounded on two sides by Buckinghamshire. This inevitably results in flawed elements in the Plan especially as regards employment/warehousing space. This is contrary to NPPF para 35c.

“Local Distinctiveness”

Whilst I agree the importance of local distinctiveness mentioned numerous times in the Plan e.g., page 22 “All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place”, I am very concerned that there is no clear vision or road-map of how this will be achieved, nor the extent to which local communities will be involved in developing this (as opposed to being kept out of the loop until plans are drawn up by consultants employed by DBC)

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12209

**Person ID**

1269470

**Full Name**

PHILIP MOORE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**Vision**

1 **The Emerging Strategy does not deliver its own vision**, in two key respects:

- The entire approach is antithetical to the stated aim that *“The natural beauty of the Chiltern Hills and the varied character of the countryside will have been enhanced”* (specific comments and evidence are set out below);

The principles (LP5.2) include inter alia *“Minimising and managing the requirement for development on Green Belt land / impact on AONB”*. There is no evidence that the Emerging Strategy attempts significantly to do this: there are only platitudes (see specific comments below).

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12223

**Person ID**

1269476

<b>Full Name</b>	EMILY DAVIES
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12239
<b>Person ID</b>	1269479
<b>Full Name</b>	BARBARA HARVEY
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. This Local Plan draft has failed to bring forward exceptional circumstances</p>

so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements

and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12250

**Person ID**

1207796

**Full Name**

Ross Gemmell

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The irreversible destruction of green field sites in Dacorum is not a sustainable approach to the housing crisis. Brown field sites, of which there are many on the area should be prioritised. High rise developments in sensitive areas are also inappropriate and have demonstrably failed to gain traction/have proven unviable and generated derelict eyesores, even in development boom-times (eg the Beacon).</p> <p>Your reference to the climate change emergency is valid, and supports the need for the preservation of the green belt.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12252
<b>Person ID</b>	1227654
<b>Full Name</b>	Mrs Margaret Warman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>Proposed number of houses excessive for the Borough.</p> <p>Tring has less than 8% of the population of Dacorum, yet has been allocated more than 16% of the proposed new homes, most of which - nearly 80%, will have to be built on Green Belt land, adjacent to the Chilterns Area of Outstanding Natural Beauty.</p>

This proposal to increase Tring housing stock by over half, building on its beautiful green spaces, will have a devastating effect on Tring. Why was this option chosen, ahead of the other options, one of which was to distribute the proposed development evenly throughout the Borough?

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12255

**Person ID**

1269482

**Full Name**

LOUISE JOHNSON

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**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**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12267

**Person ID**

1264925

**Full Name**

sharon warner

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

<b>Comment</b>	<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 another quarter increase on 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 may continue to decrease this projection.</p> <p>In this plan, thousands of new homes are simply going to be added 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. I appreciate we may not have enough brown land to build all the homes that are required but it would save large amounts of green belt land being used, once lost this can never be replaced.</p> <p>I work in a GP Surgery and we have to accept residents who wish to register at the gp practice as long as they live in our catchment area. The patients at the surgery I work at are already complaining about having to wait for so long for appointments to see a gp. I didn't see any promises of new GP's or extending the existing surgeries in the local plan.</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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12279
<b>Person ID</b>	1269484
<b>Full Name</b>	SUSAN GILL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* <b>Yes</b>	
* <b>No</b>	
<b>Comment</b>	<p>I think the number of homes planned is too many especially as there is a prodominant bias for using Green Belt Land. Communities are being over run and swamped with new housing without major improvements in the existing infrastucture to cope with the new residents or thought to old historical settlements. The total number of houses year on year is too high and does not address local housing needs for housing suitable for retired, both couples and single, single care leavers, those with Learning disabilities who need support, to mention just a few. I also think that any housing built should be as sustainable as possible, include solar, rain water harvesting and economic heating systems.</p> <p>While encouraging sustainable travel is a must, it should also be recognised that for many public transport will not work for many reasons. Any new developments need to have realistic parking so that it does not cause chaos both in the development and the surrounding area. Major modes of long range transport like the railway should have adequate parking and safe cycle storage. Tricks like providing a cycle park as pary of a development that is then scavenged back into the development as a dwelling once complete should not be granted, Cycle paths need to be fit for purpose and traffic slowed on our urban roads to 20mph to allow safe cycling and walking.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12283
<b>Person ID</b>	1269485
<b>Full Name</b>	NICOLA HULSE
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* <b>Yes</b>	
* <b>No</b>	
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p>

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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**Included files****Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12293

**Person ID**

1269487

**Full Name**

PAM MEGAW

**Organisation****Agent ID****Agent Full Name****Agent Organisation****Yes / No**

No

\* Yes

\* No

**Comment**

I recognise the need for more housing in the Borough but feel that the proposed developments in Tring which are my particular area of concern as I am a long term resident are far too large and would destroy the character of this lovely market town.

**Included files****Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12298

<b>Person ID</b>	1269488
<b>Full Name</b>	SAMANTHA SMITH
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I don't think the vision is right for the Borough and disagree with the strategy objectives. Building on Greenbelt Land goes against National Planning policy and statements by Ministers including the Prime Minister</p> <p>The current plans for expansion are far too severe with far too many houses planned. The infrastructure in the town doesn't support this growth.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12307
<b>Person ID</b>	1269489
<b>Full Name</b>	STEVE HILL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	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.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12314
<b>Person ID</b>	1264637
<b>Full Name</b>	Ollie Parrish
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate</p> <p>Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS12354
<b>Person ID</b>	1269491
<b>Full Name</b>	Mr David Eeley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

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<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12362
<b>Person ID</b>	1269492
<b>Full Name</b>	Mrs Isabelle Gorton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	

## Comment

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

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<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12379
<b>Person ID</b>	1164091
<b>Full Name</b>	R.J. Hollis
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The basis of the strategy is housing. For this, the document uses a planning algorithm provided by government in 2014 as a guide only, to be adapted by local circumstances. However this guidance was updated in 2018 and the government requires the plan to be based on the latest guidance. The government also states that this algorithm is to be developed

by the local authority to suit the local situations and protect any areas of greenbelt, AONB, SAC's etc. Presently the plan makes no attempt to do this.

The strategy should develop the area to the benefit of the local community and the environment whilst meeting government guidelines. If the strategy used the latest guidance and supported the local environment, it would be based on a housing provision at least half that proposed. This is such a vast difference as to make the strategy details as published based on the wrong premise, and therefore not accurate.

The council's starting point should be the housing need (which I understand is around 380 dba) and job opportunities to support this, which would be more in line with the current plan.

They also are expected by the government, and presumably the inspector and residents, to protect the environment, The work put into the plan so far should not influence the decision making process, so in my view the vision and the plan need revision, including strong arguments to protect the greenbelt, AONBs, SACs and the character of the area.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12398

**Person ID**

1269497

**Full Name**

MICHAEL RUDIN

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly disagree with the scale of the target for housing in Dacorum suggested by this Local Plan - a 25% growth (16,596 houses) in housing, yet there is a 9% (5,950 houses) population growth forecast by the ONS in Dacorum for the same period. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses. I support the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing. This would make the most efficient use of brownfield land, local services, and would facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision suggests a totally disproportionate growth strategy for housing within Tring (55% growth). This fails to acknowledge the contribution that Bovington, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements. I strongly object to the proposal that Tring is required

to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements.

Whilst I accept the aspirations of existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty. I object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12414

<b>Person ID</b>	1269503
<b>Full Name</b>	Mr Jan Wosiek
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I DO NOT think DBC's overarching vision and strategic objectives are right for the borough.  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.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12426
<b>Person ID</b>	1146040
<b>Full Name</b>	Mrs Rachel Macdonald
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<b>Climate Change Emergency</b>  The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.

The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.

**Overarching Vision: Environmental Sustainability**

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

**Overarching Vision: Economic Growth**

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12466

**Person ID**

629143

**Full Name**

Mr Chris Briggs

**Organisation**

Spatial Planning Manager  
St Albans City & District Council

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

**1 General Comments**

Overall, SADC is generally supportive of the DBC Reg 18 Local Plan at this stage. The detailed comments provided below relate primarily to how SADC's Local Plan position is reflected. SADC hopes these are useful in preparing for the next stages in DBC's Local Plan development.

## 2 SADC Local Plan Update

SADC withdrew our submitted draft Local Plan on 23 November 2020 and has recently embarked on a new draft Local Plan. This is currently at very early stages in its production and no decisions have yet been taken on the content of the new draft Local Plan. Some of the evidence base is also being updated. We are seeking to move forward as quickly as reasonably possible with our new draft Local Plan. We look forward to working with you to assist DBC in accurately reflecting SADC's Local Plan position in your own Plan, as you update it, in due course.

### Included files

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12476

**Person ID** 1269523

**Full Name** RORY LUMSDON

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment** Please see answers below - my specific objection is to building works on the proposed Bank Mill Lane site.

### Included files

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12486

**Person ID** 1269524

**Full Name** DAVID ATKINSON

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Personally I feel this proposal seems to disregard the need to minimise the impact on the 60% of Dacorum that is Greenbelt and the 33% which is AONB. There will be a negative impact on the environment, infrastructure, climate change and Bio Diversity, causing massive harm to the Green Belt and AONB.</p> <p>The scale of the proposed housing development is too much for the area to cope with, housing need should be based on the most relevant and recent data, which is currently the 2018 based Office for National Statistics (ONS) projections.</p> <p>The Council has based its calculations on the outdated 2014 data, resulting in a significant overestimation and bringing the plan into question.</p> <p>The proposals in the plan for the infrastructure and employment growth are not sufficient for the dwellings proposed.</p> <p>Commuter towns require transport to make journeys out of the town to travel for work, the present road and rail networks will not sustain such an increase in population.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12498
<b>Person ID</b>	1269525
<b>Full Name</b>	QUENTIN HALFYARD
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

* <b>No</b>	
<b>Comment</b>	Too many new houses and too much town crowding. The town is overcrowded as it is. The kind of accompanying infrastructure required to solve the situation is greater than is being proposed and would in any case be too radical a transformation of a medium sized town nestling within the Chilterns.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12504
<b>Person ID</b>	1269527
<b>Full Name</b>	JULIAN SMITH
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p>

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to

the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12516

**Person ID**

1207806

**Full Name**

Mr Chris Graebe

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Your vision states that "Berkhamsted will have grown and will...have delivered comprehensively planned new neighbourhoods to the south and southwest of the town in a way that takes account of sensitive views and landscape".

The growth that you are planning is grossly excessive, and takes far too little account of landscape, with its takeover of Green Belt areas causing very significant environmental harm. It takes insufficient account of the potential of brownfield sites. It disregards the impact that overcrowding the area will have on the lives of the people of Berkhamsted.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12539

**Person ID**

1269544

**Full Name**

Ms Lindy Foster Weinreb

**Organisation**

Chairman  
Berkhamstead Citizens Association

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>All 'vision' statements are inevitably framed with positive language around well-meaning, if platitudinous, sentiments. The 'Overarching Vision for Dacorum's Growth by 2038' is no different with grand statements claiming improvements will be achieved relating to Environmental Sustainability, Economic Growth and Health and Wellbeing.</p> <p>However, much of the plan under consultation works directly against those aspirations, particularly for the two historic market towns of <b>Berkhamsted</b> and <b>Tring</b> and the area between Old Hemel, Piccots End and Potten End.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12540
<b>Person ID</b>	1269544
<b>Full Name</b>	Ms Lindy Foster Weinreb
<b>Organisation</b>	Chairman Berkhamstead Citizens Association
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>We strongly disagree with 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth is obviously too much for the town. With circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, this equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint (Google Earth used for calculations), most of which is located within sensitive ridge top locations in Green Belt.</p> <p>We note that the 2013 Core Strategy vision of <i>"maintaining the strong valley and linear character of the settlement"</i> has now been emphatically dumped. Where previously the Council asserted that <i>"The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported"</i> (and put this</p>

argument strongly to the Planning Inspector), DBC now promote the land for removal from Green Belt and suggests that development can now be built *“in a way that takes account of sensitive views and landscape”*.

The plan removes green belt areas that have become and are becoming increasingly popular walking/rambling routes and provide easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes. Over the pandemic residents have not flocked to the likes of Velvet Lawn to do laps of a sports’ field, but rather the immediate and wider countryside which is greatly valued by our residents. It’s loss will inevitably lead to an increase in mental health problems as evidenced by research. It has been found that green space protects against mood disorders, depression, neurotic behaviour, and stress-related issues.. The effect of green space is also dose-dependent, meaning those who have longer exposures to green space have greater mental health benefits.

We are conscious that the preparation of the Draft Plan by the Borough’s Officers has been a mammoth task over many years. We commend their work which has drafted a coherent Plan that updates the multiplicity of documents that comprise the Policies set out by the Adopted Core Strategy of 2013. However.

Much that follows in this response and our replies to the questions posed will be very much at odds with the Draft Plan’s intention that the Borough should meet the directive on the ‘target’ number of dwellings determined by the Ministry of Housing Communities and Local Government.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12542

**Person ID**

1269544

**Full Name**

Ms Lindy Foster Weinreb

**Organisation**

Chairman  
Berkhamstead Citizens Association

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

The subsequent comments serve to alight on the numbers designated [SP2] 16,596 dwellings (viz 922 pa) over the Plan period 2020 – 2038. We remain unconvinced that this number (nor the 1023 pa) should be adopted for the Plan Period

given that ONS projections based on 2018 data indicates the annual need is around 350 dwellings pa. Moreover, this contrasts with the current Adopted Plan (Core Strategy 2013 – 2036) that settled on 430 pa.

Starting from a premise that is suspect and therefore contentious, the overarching Vision is thus undermined or at least questionable; the prospective high build rate will adversely impact the principal urban centers and especially the unwarranted loss of swathes of Green Belt, including around Berkhamsted/Northchurch/Tring, that are designated in the Draft Local Plan as 'Growth Areas'.

Further discussion on the matter is set out in Q 7

This section relates to proposals set for Berkhamsted and Northchurch [considered in the Draft Local Plan as West Berkhamsted]: over the planned period 2200 dwellings are scheduled [SP2- 3b] of which around 500 are in Northchurch Parish and 1700 in Berkhamsted. This equates to a substantial increase in the number of dwellings in Berkhamsted/Northchurch of around 24% - over the 18-year Plan period and where most of the designated sites are currently in the Green Belt at some distance (3 – 4 km) from the town centre and station at the top of steep valley sides. We cannot see how new housing developments at this distance (and difference in elevation) from main services infrastructure can be considered as “sustainable”.

As recognised in Para 23.119 [Page 225] the Town experiences a high level of congestion:

The following paragraph says: “there are few opportunities for new road capacity in the town”. As a town set in a valley with only one main crossing the county’s engineers comment the traffic lights already operate at over capacity. This results in residents choosing to avoid the main roads in the town centre or travelling to shop elsewhere.

The Draft Plan continues:

The referenced ‘Berkhamsted and Tring Sustainable Transport Strategy’ [Para 23.122] is nothing of the sort, mapping as it does junction enhancements at relatively minor side roads and crossings within the urban area and new/widened footpaths along Shootersway. In the absence of a well- considered Strategic Transport Plan that addresses the critical issues, and its inclusion in the Infrastructure Development Plan, We do not support this Draft Plan to accommodate the Sites designated.

The last sentence is an aspiration without a foundation to support it: The Plan offers no substantive detail that necessary strategic infrastructure or sustainable transport options, to provide access to the town centre and station, from the proposed development sites, other than by car, have been planned for.

The referenced ‘Berkhamsted and Tring Sustainable Transport Strategy’ [Para 23.122] is nothing of the sort, mapping as it does junction enhancements at relatively minor side roads and crossings within the urban area and new/widened footpaths along Shootersway. In the absence of a well- considered Strategic Transport Plan that addresses the critical issues, and its inclusion in the Infrastructure Development Plan, We do not support this Draft Plan to accommodate the Sites designated.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12563
<b>Person ID</b>	1269554
<b>Full Name</b>	Ellen Satchwell
<b>Organisation</b>	Sustainable Development Lead Advisor - Thames Solent Team Natural England
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Area of Outstanding Natural Beauty Management Plans, Rightsof Way Improvement Plans and Green Infrastructure Strategies, Nature Recovery Network.
<b>Included files</b>	<a href="#">NE Response_Dacorum Local Plan Strategy for Growth Feb 2020.pdf</a> <a href="#">Evidence advice v2.pdf</a>
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12568
<b>Person ID</b>	1261562
<b>Full Name</b>	Sally Symington
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

\* Yes  
\* No

**Comment**

My thanks go to the officers and many others who have contributed to the Draft Local Plan. It constitutes a massive body of work covering very many diverse areas and aims to bring together many competing and conflicting priorities at a time of great upheaval in the way we live due to the pandemic; the future of our London-based financial services industry, international trading relationships and manufacturing capacity due to Brexit. Regenerating, building and sustaining our communities for the future, whilst mindful of the climate emergency we face, is paramount.

The number of houses the borough is required to deliver per annum under the current methodology (whether it be the 922 stated in the Draft Local Plan or the adjusted figure of 1023 announced on 16 December 2020) is far in excess of that needed to meet our local housing need (355). The most recent figure from MHCLG gives 1023 dwellings per annum as a minimum for the borough and bases its algorithm on 2014 ONS population data. The Borough should use the most recent data available for the plan process, ie the 2018 ONS population data.

The Plan takes no account of government policy to 'level up' across the country and for the reuse of city and town retail and office space following the pandemic. These factors should lead to the Borough having a lower housing figure.

The key demand for housing in the borough is for social housing and housing suitable to accommodate the predicted 60% increase in the over

65-year-old age group. The Plan allows for social housing build at around 70 dwellings per annum. This falls far below the required number, estimated to at 611pa. The number of people currently on the housing register is around 7000.

The calculated Urban Capacity of the Borough (TRL Interim Sustainability Appraisal Report Nov 2020) equates to a level of development of about 600 dwellings per annum or 10,440 dwellings over the plan period. When other commitments and a windfall allowance is made for the rural area outside of the six main settlements, the total capacity is 10,954. This would meet our local need as determined by 2018 population figures. But even if it is necessary to achieve the higher figures set by the government's algorithms, this could be done using the Urban Capacity and by developing a far smaller proportion of Green Belt than the estimated 850 ha currently proposed. The plan does not demonstrate 'exceptional circumstances' for the release of Green Belt.

In proposing the release of so much Green Belt land, the Plan fails to meet two of the borough's key strategic objects: mitigating and adapting to climate change; and conserving and protecting the natural environment.

The projected increases in the number of new homes in Berkhamsted and Tring during the plan-period leave both historic market towns overwhelmed and short of vital infrastructure. There is a huge risk of damaging the historic context of the towns and their respective settings, irrevocably.

The huge 212 ha HH01 site north of Hemel Hempstead also damages the setting of the Area of Outstanding Natural Beauty on both sides of the Gade valley whilst releasing a large amount of Green Belt land for 1550 homes and therefore yielding a low density of housing (7dph). This contrasts with the adjoining site, HH02, which will deliver over 4000 homes across the 161 ha site (25dph). The site, HH01, could be significantly reduced in size and still accommodate the homes proposed in the Plan; more clearly merge with and relate to HH02 in terms of density of housing, and reduce the burden on the Green Belt.

The smaller villages with shops and schools are more sustainable than the Plan allows for and could be further developed to allow for organic growth. The Plan is limiting for villages and threatens the viability of local shops and schools, with the latter populated by children being driven out from the towns to fill places.

The Plan makes clear the shortfalls in employment land across the Borough. There are longer term plans to bring land forward in conjunction with St Albans District Council at Maylands but opportunities in Tring and Berkhamsted are limited and constrained by the Green Belt. Changes to working patterns and the location of jobs previously based in London, will affect those areas the Borough that have historically had a commuter population. Planning for employment need to go hand in hand with planning for homes.

Housing densities vary significantly across the Borough and within settlements. Hemel Hempstead sites such as HH2, HH22 have a density of 20 dph; whereas Bk01 has a proposed density of 28 dph and similarly Tr02 has a proposed density of 27 dph and Tr03, East of Tring, has a housing density of 13 dph. To avoid excessive Green Belt releases, these figures should be tested thoroughly. For example: in the case of Bk10, Hanburys, the stated number of homes is 40, whereas planning permission has already been granted for over 120 homes.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12580

**Person ID**

1269559

**Full Name**

Ms Jessica Giolda

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>DBC overstates the housing need.</p> <p>Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.</p> <p>Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."</p> <p>There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.</p> <p>A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.</p> <p>Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.</p> <p>DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS12586
<b>Person ID</b>	1269561
<b>Full Name</b>	Mr & Mrs Martin & Tracey Martin & Tracey Read
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <ul style="list-style-type: none"> <li>We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12694
<b>Person ID</b>	1269597
<b>Full Name</b>	Ms STEPHANIE HOWE
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	No definitely I do not think they are right. An increase of 25% in housing is far too much for the borough. Your objectives will mean a huge loss of green belt and open spaces. Completely changing what is now a pleasant place to live into an overcrowded under provisioned sprawl.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12704
<b>Person ID</b>	1269600
<b>Full Name</b>	Alex Marsh
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <ul style="list-style-type: none"> <li>We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12724
<b>Person ID</b>	1269605
<b>Full Name</b>	Ms Hailey Woldt
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
Comment	The Local Plan's 922 houses a year is beyond the 355 houses a year the latest Office of National Statistics identifies as Dacorum's Housing need. The plan is not, therefore, based on evidence. Also, too few of the houses proposed will provide the social or truly affordable houses needed to meet the needs of the 7,000 people on Dacorum's housing list.
Included files	
Consultation Point	Borough Vision to 2038
Comment ID	EGS12736
Person ID	1145958
Full Name	Mr Adrian England
Organisation	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
Comment	<p>I am sorry, but no, I do not.</p> <p>The vision for these numbers cannot be realised without irrevocable damage to the Borough's residents' health, wellbeing and cohesion, through permanent loss of greenbelt, an overwhelming increase in population, depletion of natural resources, and a failure to reduce Dacorum's demand for CO2-producing goods, consumables and services – simply as a product of increased population.</p> <p>While the core objectives are correct, I think that in re-directing the Plan, these need to be put into a purposeful structure of priority, as some objectives clearly constrain others.</p> <p>There are EIGHT Core Objectives, given equal status, but I argue first that these are not objectives (not least since they are not quantified or specified), rather they seem to be “values”.</p> <p>Second, I argue these values would be better expressed in service to residents of the Borough. When expressed – or argued – as a primary objective (supporting health, wellbeing and cohesion) plus three constraining/shaping objectives, and a set of four “balanced” factors, these would, more clearly and usefully, set out the proper rationale of the ESfG as the Emerging Strategy for <b>Community</b> Growth (ESfCG).</p>

Community health, wellbeing and cohesion (1) must be paramount. 150,000 people who know Dacorum and call it home. 120,000 people, only a fraction of whom have been reached by this consultation. 30,000 children who will become adults during the period covered. 7,000 people are on the Housing Register, many need to work locally, and all should be supported to feel involved and proud of their neighbourhoods and Borough.

We face a Climate Emergency (2) and as the plan says, we must “conserve the natural environment” (3) – these are clear, unavoidable constraints on growth, with consequences if they are ignored. We know we do not have enough groundwater, so the early years must be particularly constrained by this factor. The ESfG glosses over this point presently, with no clear action plan, making the whole Strategy inert. We need “sustainable transport and connectivity” (4), to address the Climate Emergency.

The remaining objectives are thus constrained; inevitably these factors will compete with each other, within the envelope set by my primary objectives, and must be managed in balance:

We clearly choose to have an “attractive and valued built and historic environment” (5), and this must be, can be, in equilibrium with an “an economy which is distinctive, providing opportunities for residents to work and build thriving businesses in the Borough” (6).

“Delivering Dacorum’s future with homes for everyone” (7) is particularly constrained by the context of values/objectives (1) (2) (3) and (4), and must reference the generational opportunity to address the pressing need for social housing as a development priority.

I accept that a part of the function of housing development has previously been to help **fund** infrastructure (8), but this too must be planned in the context of values/objectives (1) (2) (3) and (4).

THE 922/1023 NUMBERS ARE NONSENSE AND ARE TOO UNCERTAIN FOR THIS PLAN TO BE CO-PRODUCED BY RESIDENTS

Government is committed to an increase in homebuilding and has set out a series of confusing formulae for allocating targets.

In an attempt to make housing more affordable across the Country, Government set a target of building 300,000 new homes per year. Other parties also used this figure at the 2019 General Election. The Johnson Government has envisaged 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 an economics-literate 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, because of the huge reservoir of buying-power able to be tapped by moving out of London. London is not great value 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.

On the face of it, the growth trajectory percentages are dramatic and challenging for place-makers to manage.

Much of the work done on the local plan was carried out before COVID-19 and the consideration of changes in lifestyle as a result of the pandemic and arising from it have not been included in arriving at this plan for how Dacorum will grow and change over the next 18 years. This is a major flaw in the plan, and it is vital that this is rectified.

The Emerging Local Plan provides paradoxically for too many homes overall, and insufficient social housing. The number of homes calculated by the Standard method has changed during the course of the consultation,

Initially, the Standard method that required a 2.6 fold increase in our housing numbers from the Objectively Assessed projections from the ONS 2018. This meant that our projection of 355 dwellings per year was increased to 922. The algorithm which caused this unrealistic uplift was widely criticized and has been abandoned.

While it is positive that the original algorithm for the Standard Method has been readopted, which limits the increase to 1.4 times the ONS figure, it is not clear why out of date figures (2014) from the ONS are required to be used, when there are more recent projections 2018. The result of this is that our housing target figure has increased to 1023, and this is both completely out of step with the actual need for new homes in Dacorum, AND a target so large that it risks large amounts of countryside, the amalgamation of our distinct settlements and fundamentally flies in the face of national climate change commitments.

Even leaving aside the nonsensical use of 2014 figures when 2018 figures are available, there seems to be a conflict between “objectively-assessed need” (which is itself confused between the assessment of affordable housing need, the unique characteristics of Dacorum and the NPPF disposition towards growth) and local sustainable capacity and place-making.

We know that there is a Climate Emergency; our planet is heating up, weather is becoming more extreme, populations are growing (increasingly this is because lives are longer and we must manage the cost of typically much longer periods of retirement). We see the uncertain implications of the Covid pandemic, artificial intelligence and the psychological implications of online communications.

As a Councillor at Dacorum I recognise that there will be conflicting priorities among residents. We may have lived here all our lives and remember how things were, or plan to live here for the next 18 years during which this plan is delivered, perhaps even longer, for the remainder of our lives!

We may have even more children of Hemel parents, themselves struggling to afford to live in Dacorum.

We may have had opportunities and capital gains from rising property values.

We know that there are 7,000 people on the Housing Register, who are in need of housing.

We may have pride and affection or ambition for our town or village to either continue being something, or to develop (whether or not development needs to result in growth).

We have work to do, to improve Dacorum, to respond to the Climate Emergency and to use our collective contribution to the UK economy to improve our health, our wellbeing and our sense of being part of a cohesive community, at each level, street, neighbourhood, district, County, Region, Country, and on this one planet we have to share with all living things, for our own self-interest.

In line with the structured objectives/values (as described above) the ESfG must challenge MHCLG numbers which use 2014 Office of National Statistics data on housing need, rather than the more recent 2018 ONS data.

If the Local Plan truly is driven by evidence of housing 'need', why does the ESfG not already establish a higher percentage requirement for "Affordable" housing and quantify an action plan to significantly increase the numbers of homes available at Social Rent levels? This aspect of housing cannot be left to a market mechanism where the developer funds social housing. Alongside other sources of funding, Dacorum must itself invest, both for a financial return and to house local people.

**Included files** [Adrian England - AE Local Plan ESfG Final.pdf](#)

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12740

**Person ID** 1250257

**Full Name** Kate Harwood

**Organisation** The Gardens Trust

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment** We consider that this plan does not fulfil the criteria for sustainable development as detailed in the NPPF, specifically 2.8c, *the environmental objective* in conjunction with 16.184 *Conserving and enhancing the historic environment*. This sets out that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance. There are no policies in this plan considering Historic Parks and Gardens and their settings.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12747

**Person ID** 1250256

**Full Name** Herts Gardens Trust

**Organisation** Herts Gardens Trust

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	We consider that this plan does not fulfil the criteria for sustainable development as detailed in the NPPF, specifically 2.8c, <i>the environmental objective</i> in conjunction with 16.184 <i>Conserving and enhancing the historic environment</i> . This sets out that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance. There are no policies in this plan considering Historic Parks and Gardens and their settings.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12777
<b>Person ID</b>	1269628
<b>Full Name</b>	Steven Bragg
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p>

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovington, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12788

**Person ID** 1269630

**Full Name** Christopher Lyne

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment** The Plan undeniably has some very positive intensions and aspirations. The issue is one of trust – will the Council stick to the Plan in the face of pressure from greedy developers and demands from central Government’s knee-jerk policy making? Such trust has to be earned and the Council’s acceptance of absurdly high housing targets is not a good start.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS12797

**Person ID** 1269632

**Full Name** Mrs Katrina Lovett

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	(no comment)
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12801
<b>Person ID</b>	1144694
<b>Full Name</b>	Mr Barry Fuller
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<ul style="list-style-type: none"> <li>• Green Belt land should only be developed in exceptional circumstances and that case has not been made, especially as alternative Brownfield sites are available</li> <li>• The calculation of the number of houses required to be built is flawed as out of date ONS figures have been used resulting in the amount of additional housing proposed being unnecessarily high</li> <li>• Growth in housing should be accompanied by growth in employment to reduce unnecessary personal journeys to and from work/the railway station which could be better achieved by building new houses in Hemel Hempstead, rather than Berkhamsted and Tring, where there is a natural centre of local employment, infrastructure, transport hub, civic amenities etc</li> <li>• Berkhamsted with proposed additional housing of 2200 has no capacity for increased local employment and the number of houses is out of proportion to its current size. The impact on local infrastructure will be significant especially the road systems, where the High Street and London Road are already very congested at peak times, especially during early morning and late afternoon.</li> </ul>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12811
<b>Person ID</b>	1269634
<b>Full Name</b>	Frank Worth
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>— We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12834
<b>Person ID</b>	1269646
<b>Full Name</b>	Colin McHugh
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Comment</b>	<p>It is obvious that any concerns and objections about overbuilding and overdevelopment, particularly in Tring, are NOT taken into consideration by DBC.</p> <p>The new development at 'Roman Park' is testament to this!</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12840
<b>Person ID</b>	1145801
<b>Full Name</b>	Mr Guy Barlow
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Over-provision of housing based on inaccurate and superseded data - this dates from 2014 and not the most upto date date in 2018.</p> <p>I believe the council's vision is flawed as it is based on out of date ONS data which has led to a significant over-estimate of Dacorum's housing needs. Please see my comments for Question 7. Put simply, the predicted levels of growth and hence yearly targets for associated housing development are too high.</p> <p>Borough Vision – The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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</p>

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.

#### Climate Emergency Issues

Dacorum Borough Council has declared a climate emergency and indicated that this should be a central pillar in any future plans for the borough. This local plan vision as published prioritises economic growth and greenfield land development over considerations for the climate emergency. 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.

#### 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) Berkhamsted & Tring Developments

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

In regards to Berkhamsted, and the proposal to build 2,236 houses over the next 18 years , this will increase the population of the town in the region of 30%. This figure is ridiculous and I do not think has been thought through, bearing in mind the current demand on the town infrastructure and access into the town. By increasing the population by this amount the towns services, schools and infrastructure will not be able to cope with this amount of growth and in reality it will ruin the town.

DBC should retain the Core Strategy Settlement Hierarchy as the revamped one fails to protect the historic character and setting of Berkhamsted by facilitating a 24% increase in dwellings and 31% increase in urban footprint through the release of Green Belt.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12855

<b>Person ID</b>	1269653
<b>Full Name</b>	Tony Dowle
<b>Organisation</b>	Director Rathbawn Properties Ltd
<b>Agent ID</b>	1269652
<b>Agent Full Name</b>	Miss Lucy Morris
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12868
<b>Person ID</b>	1207443
<b>Full Name</b>	Mrs Jennifer Bissmire
<b>Organisation</b>	Clerk Markyate Parish Council
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Notwithstanding the joint representation from the Town & Parish Councils on the fundamental flaw in the Local plan in that the housing need is not supported with the latest information and there should be no development in the Green Belt, there are issues specific to Markyate where the vision fails.  There is nothing to envisage meeting the needs of older people in the village.

The Plan may suggest it will maintain commercial enterprise and employment opportunities in the village, but this is not met with anything in the vision.

The plan identifies the risk of flooding in the proposals for Markyate, but ignores the protection which should be there as the land is in the Green belt.

The vision of convenient access between jobs, homes and facilities, minimising the impact of traffic and reducing the overall need to travel by car does not include any vision of how to achieve this for Markyate. Nowhere does the A5/A5183 appear as major route, yet Markyate straddles it.

While sharing the planning process with other Hertfordshire regions, no liaison with Mid Bedfordshire or Luton Borough Councils is recorded yet these are the immediate neighbours to Markyate and will need to help to deliver any vision of improving passenger transport to be reliable, integrated and accessible.

While professing to a vision of conserving and enhancing the landscape and scenic beauty of the Countryside and the Chilterns Area of Outstanding Natural Beauty this would seem to be of less concern than targeting growth. The vision of promoting the distinctiveness of each of Dacorum's towns and villages does not take account of development under the previous plan and the impact that has already happened. This includes the adverse impact on the character of Markyate and on the increase in carbon emissions locally.

The vision of enabling the Delivery of Infrastructure is not supported within the Plan; certainly Markyate has no infrastructure in place to meet any further development.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12871

**Person ID**

1269665

**Full Name**

Mr Martin Hicks

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Whilst the visions are laudable for the borough, towns and villages, the expectations of their delivery are woefully inept. The Plan is based upon Sustainable Development which I support; so how is this to be delivered?

Regarding the Natural Environment, 2.19 recognises the combined effects of climate change, population growth and development needs will increase pressure on the natural environment. Dacorum has a particularly sensitive environment in Dacorum, (including the Chilterns

AONB) and the presence of the Chilterns Beechwoods SAC, and other hills, river valleys such as the Gade, Bulbourne and Chess. The plan states 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; careful land management.

The issue is how can these be achieved, and what evidence is presented that it can?

In terms of landscape and biodiversity, land management is fundamental but a local plan cannot control this - it is not development. Nothing else in the plan supports the means to achieve this despite the outcome claims of growth and consequently this environmental element of SD cannot be delivered, at least not without further evidence or strategies to enable this. Nowhere is the role of farming, local food production, markets and support for these mentioned, yet it is farming which has shaped the natural environment, affected it but is also required to restore it and underpin its proper stewardship. This is a wholly 'urbancentric' vision of the environment which fails to recognise, let alone understand, let alone support, these important relationships. This element is wholly missing from the plan; consequently, SD cannot be achieved under the auspices of this plan.

Tring is proposed to be maintained as a Market Town, but the proposals are to build on its bespoke Market Site! Development that 'takes account protected environmental sites' is achieved by building on one! A 55% increase in a town surrounded by national and internationally valuable and fragile ecological sites already suffering from disturbance and damage by visitor pressure is wholly unsustainable without any evidence that these issues can be addressed. Claims to protect and enhance Dacorum's biological diversity are unsubstantiated; delivery of net gain is predicated on development, and required management capacities thus far ignored by the plan; it is therefore unachievable.

How is the landscape and scenic beauty of the AONB to be conserved and enhanced? No evidence.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS12912
<b>Person ID</b>	1269666
<b>Full Name</b>	Mr Andrew Oliver
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The most recent statistics from the ONS show a need for 355 new homes a year over the period of the plan. The target of 922 homes a year far exceeds this.</p> <p>The proportion of planned homes for social and affordable housing is too low considering the 7000 applicants on housing list for Dacorum.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12926
<b>Person ID</b>	1269677
<b>Full Name</b>	CAROLINE CLIST
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Generally, okay.

Some elements (e.g. increasing growth) seem stuck in the 20th Century. Theme 2 in particular is not clear on how a 'vibrant economy' is measured. This was obviously very different in the 20th century and we need to use Doughnut Economics if we are to thrive in the 21st. We cannot improve on our social foundation without paying attention to the ecological ceiling and with more than 60% of the Borough being rural land, there is massive (apparently being missed) to integrate the Country into (what appears to be exclusively) Town planning.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS12934

**Person ID**

1269678

**Full Name**

GARY TRENT

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Dacorum does not need additional housing. Desire for people to live in an area is not the same as a need for housing. Green Belt should not be sacrificed for the housing or employment development. The investment should be made strategically in areas where it is desperately required to boost economies and employment, and the housing that would accompany it, the deprived areas of the country. Increasing housing and everything that goes with it will simply continue to increase housing costs in Dacorum as employment and new housing attract ever increasing demand from more deprived areas. It simply exaggerates the differentials between wealthy boroughs like Dacorum and poor, deprived areas of the country, effectively worsening poverty overall whilst destroying Green Belt.

The vision is flawed. Development should be constrained within urban parts of the borough. The investment in a perceived housing need should be invested where it is needed to even up opportunity, wealth and infrastructure throughout the country.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12953
<b>Person ID</b>	1269679
<b>Full Name</b>	GARY CALLUM
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	Broadly speaking, I support the Borough s strategic objectives assuming the Government s demands for so many houses to be built in Dacorum have to be met.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12958
<b>Person ID</b>	
<b>Full Name</b>	
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Housing developments are too high density. Infrastructure and environment will not cope and I do not trust Local Authority to carry out necessary improvements.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12967
<b>Person ID</b>	1264971
<b>Full Name</b>	Louise Watson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>No Building more houses within the London commuter belt will not reduce house prices for local people looking for their first home – it will just attract more commuters moving out from London.</p> <p>Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p> <p>Any plan that involved building on precious green belt rather than brownfields and previous developed locations is short-sighted and lazy.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12982
<b>Person ID</b>	1269776
<b>Full Name</b>	STEPHEN MACKENZIE
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	The balance of the location of new development across decorum is skewed. Far too much greenbelt land would be given up. Developer preference for locations seem to dominate over what is actually required in each location. The existing individual character of smaller towns look to have been sacrificed to this end. Even if this was put aside, the plans to mitigate the impact on areas suggested for major development, for example better transport links, schooling and other infrastructure appear merely aspiration and and lack any detail.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS12996
<b>Person ID</b>	1059698
<b>Full Name</b>	Mr Richard Lyne
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The Plan undeniably has some very positive intensions and aspirations. The issue is one of trust – will the Council stick to the Plan in the face of pressure from greedy developers and demands from central Government’s knee-jerk policy making? Such trust has to be earned and the Council’s acceptance of absurdly high housing targets is not a good start.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13004
<b>Person ID</b>	330928
<b>Full Name</b>	Mr James Gregory

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>The plan takes no account of the topography of Berkhamsted, the growth predictions for the town are unrealistically high compared to the rest of the country; the forecast is target based thereby taking a narrow view.</p> <p>Health, infrastructure, employment, education, amenity supply, services, environmental impact, life support such as water management, climate and zero carbon matters are not included or ignored. The claim that the schemes will provide affordable housing is laughable as the location generates prices up to 60% higher than the UK national average house price.</p> <p>The dwelling increase proposed for the Shootersway of Berkhamsted is ill thought out and dangerous.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13030
<b>Person ID</b>	1270011
<b>Full Name</b>	Mrs Nicola Davis
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>At least 2,200 new homes in Berkhamsted is a massive over-estimation of the town's needs. To have an influx of around 8,000 people when we have a population of 20,000 is irresponsible. I have a huge concern from an environmental position with the plans to build on Greenbelt land on the outskirts of the town.</p>

I believe the council's vision is based on out of date ONS data, which leads to a significant over-estimation of Dacorum's housing needs.

Protection of Greenbelt and conserving the natural environment should be guaranteed by the council; I don't believe enough considerations have been given to this sections.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13040

**Person ID**

1270013

**Full Name**

Mr Daniel Ritchie

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**Climate Change Emergency**

The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.

The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas ("GHG") emissions.

**Overarching Vision: Environmental Sustainability**

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

### **Overarching Vision: Economic Growth**

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

### **Berkhamsted & Tring Developments**

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13065
<b>Person ID</b>	865165
<b>Full Name</b>	Mrs Rosemarie Hollinghurst
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I fail to see why we need such extensive development. Ten years ago Tring and Berkhamsted were designated to remain as discreet market towns. In Bucks and Beds there are thousands of new houses being built within a 15 minute drive of Herts. The proposed housing numbers for Dacorum are too high. They cannot be accounted for by natural growth. Dacorum will be housing residents from London, who will then have to commute back into London.</p> <p>The speed at which this expansion is laid out is too fast. I cannot imagine that the maximum number of houses being completed will be in 2027. Will all the necessary regulation be adhered to?</p> <p>This sudden expansion is taking place at the same time as the Green Agenda is at last taking shape. I hope all these new houses are not built with poor insulation, gas central heating and cooking, and no electric car charging points just before we should be moving to a new era.</p> <p>How can we be sure that the proposals will be adhered to? SP5 states that employment sites are at critically low levels. The development at LA5 included an extension of the industrial site on Icknield Way – but now, as the houses are being delivered, they have changed the plan and instead of industrial premises, another 50 houses will be built. Where will these people work?</p> <p>It is stated in the overarching vision on page 22 that the impact of growth of the Chilterns Beechwoods Special Area of Conservation will have been effectively mitigated, but I couldn't find the detail of this.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13072
<b>Person ID</b>	1270019
<b>Full Name</b>	Ms Clare Kirwan
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No

<b>Comment</b>	NO. The plans Dacorum are excessive and takes away from the charm and individuality of our small towns.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13083
<b>Person ID</b>	1270032
<b>Full Name</b>	MRS JILLY HENRY
<b>Organisation</b>	
<b>Agent ID</b>	1270033
<b>Agent Full Name</b>	MR JOHN C.E. PHILLIPS
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The overarching vision and strategic objectives can not be met unless the major challenge set out in para 2.3 of the draft plan to deliver, 'a step change in the level of housing growth is achieved. In our view the plan fails to meet this challenge. Failure to meet the objective whilst an issue in its own terms for housing delivery also has implications for the overall vision for the District. In particular the re-generation of the local economy and other economic objectives will be compromised unless housing needs are met particularly given an aging working population.</p> <p>However the objective set out in para 2.24 of the emerging strategy to ensure, 'The important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough ' is supported and our representations identify opportunities to assist that objective.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13087
<b>Person ID</b>	1264779
<b>Full Name</b>	James Froggatt
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	My comments are confined to Hemel Hempstead where 10,688 homes are planned to be built Regrettably I find this strategy rather unimaginative, non radical and slanted towards the needs of the construction industry rather than the consumers of the “homes” it is intending to provide
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13096
<b>Person ID</b>	1270037
<b>Full Name</b>	MRS GINA BARLOW
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	Over-provision of housing based on inaccurate and superseded data - this dates from 2014 and not the most upto date data which is available from 2018.  I believe the council's vision is flawed as it is based on out of date ONS data which has led to a significant over-estimate of Dacorum’s housing needs. Please see my comments for Question 7. Put simply, the predicted levels of growth and hence yearly targets for associated housing development are too high.  Borough Vision – The Council's Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon Neutral and the environment and natural resources protected.

The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance.

This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. 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.

#### Climate Emergency Issues

Dacorum Borough Council has declared a climate emergency and indicated that this should be a central pillar in any future plans for the borough. This local plan vision as published prioritises economic growth and greenfield land development over considerations for the climate emergency. 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.

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).

#### Berkhamsted & Tring Developments

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

In regards to Berkhamsted, and the proposal to build 2,236 houses over the next 18 years , this will increase the population of the town in the region of 30%. This figure is ridiculous and I do not think has been thought through, bearing in mind the current demand on the town infrastructure and access into the town. By increasing the population by this amount the towns services, schools and infrastructure will not be able to cope with this amount of growth and in reality it will ruin the town for everyone who lives here.

DBC should retain the Core Strategy Settlement Hierarchy as the revamped one fails to protect the historic character and setting of Berkhamsted by facilitating a 24% increase in dwellings and 31% increase in urban footprint through the release of Green Belt.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS13145
<b>Person ID</b>	1270066
<b>Full Name</b>	Dr Amanda Cole
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to play a much greater role in delivering housing growth within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p>

I strongly object to your claim that your vision of Tring has delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13157

**Person ID**

1270068

**Full Name**

Ms Francesca Greenoak

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	As a former warden of English Nature at their Tring Reserve, and chair of the Hardings Wood Trust, I would like to note that Tring and its immediate environs have an important wildlife significance. [ 2.19, page 16 ]
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13160
<b>Person ID</b>	1270069
<b>Full Name</b>	Patrick Moloney
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>—No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</p> <p>—Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</p> <p>- We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS13175
<b>Person ID</b>	1144725
<b>Full Name</b>	Mr Philip Anderson
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<ul style="list-style-type: none"> <li>• No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</li> <li>• Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</li> <li>• We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13194
<b>Person ID</b>	1270127
<b>Full Name</b>	Amy Moloney
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Comment</b>	<ul style="list-style-type: none"> <li>• No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from London.</li> <li>• Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</li> <li>• We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13206
<b>Person ID</b>	1270128
<b>Full Name</b>	Richard Salway
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Climate Change Emergency</p> <p>The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.</p> <p>The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas ("GHG") emissions.</p> <p>Overarching Vision: Environmental Sustainability</p> <p>The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.</p> <p>Overarching Vision: Economic Growth</p>

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

**Berkhamsted & Tring Developments**

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but I believe that 'affordable' needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13233
<b>Person ID</b>	1258764
<b>Full Name</b>	Mark Bullard
<b>Organisation</b>	Tring Squash Club
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	The overarching vision does not comment sufficiently how the provision of new sport facilities will integrate with existing sporting facilities. The sports clubs in Tring favour increased sport provision on land contiguous with existing facilities. This approach would lead to efficient use of common facilities, such as club houses and changing facilities as well an economy of scale in supporting infrastructure needs such as car parking, foot and cycle paths.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13239
<b>Person ID</b>	1270143
<b>Full Name</b>	Mr Thomas Parsons
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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, Berkhams 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 a outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falli 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 pr water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs (to name but a few crucial infrastru 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 high levels of air pollution and the continuing lack of clean drinking water in this area have not been considered with increased breathing related illn etc, this area needs conservation not concrete.</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 exis and infrastructure.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS13268
<b>Person ID</b>	1270153
<b>Full Name</b>	Mr Peter Cracknell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	I think that Berkhamsted is already bigger than the local employment market can sustain. Any increase would just be more commuters. The areas proposed are not within walking distance of town,, and the hills make cycling impracticable. Indeed i have only ever seen 1 person cycle to town from the Hall-Park estate area.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13279
<b>Person ID</b>	1270157
<b>Full Name</b>	Ms Claire Laing
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Daoorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemet Hempstead- a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemet Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged. however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area or Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose or seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead or such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13290

**Person ID**

1270175

**Full Name**

Mr Chris Bugden

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

(no comment)

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13314

**Person ID**

1270198

**Full Name**

Mr Hilary Curtis

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>DBC overstates the housing need.</p> <p>Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.</p> <p>Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."</p> <p>There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.</p> <p>A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.</p> <p>Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.</p> <p>DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13320
<b>Person ID</b>	1270200
<b>Full Name</b>	Mr Richard Harman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.</p> <p>In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!</p> <p>In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.</p> <p>The Council’s proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13341
<b>Person ID</b>	1270207
<b>Full Name</b>	Ms Helena Thorpe Foulsham
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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>Reasons:</p> <p>* Adverse effect on the residential amenity of neighbours, by reason of noise disturbance Unacceptably high density / over-development of the area, which would involve the loss of the open aspect of the neighbourhood Visual impact of the development Effect of the development on the character of the neighbourhood The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners</p> <ul style="list-style-type: none"> <li>• Inappropriate development in Green Belt - when there is sufficient brown belt areas to consider first</li> <li>• Harm to landscape of outstanding Natural Beauty</li> <li>• Threat to wildlife - hedgehogs, bats, muntjacs, foxes, rabbits, birds, toads, squirrels</li> <li>• Loss of important wildlife habitats</li> <li>• Over development - Insufficient garden of amenity land</li> <li>• Lack of private space for walking, bird watching, nature spotting</li> <li>• Spoiling natural or existing contours - which could result in land flooding which is already happening on this site (photos available upon request)</li> <li>• Loss of important trees, hedge or other vegetation which our wildlife depend on</li> </ul>

- Threatening a public right of way - there a public footpaths around this area for walkers which would be lost
- Insufficient parking spaces
- Destroying traditional field patterns
- Loss of high-quality agricultural land
- Are public sewers adequate ?
- This site was previously a dumping ground - what are the effects of turning this area/ soil up - what contaminations are in the soil?
- Visually damaging in the landscape
- Environmental damage caused by vehicles
- Road systems are inadequate - these are Country lanes and have been for centuries
- Loss of open spaces
- Losing historic rural settlement patterns
- Adverse affect on rural economy - agricultural land loss

\* Creating imbalance between jobs and homes

\* Overloading the area with no hospital and overcrowded schools

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13349

**Person ID**

490211

**Full Name**

Ms Barbara Saville

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

* Yes	
* No	
<b>Comment</b>	<ul style="list-style-type: none"> <li>• No - building more houses within the London commuter belt will not reduce house prices for local people looking for their first home — it will just attract more commuters moving out from</li> <li>• Developer led housing will not provide more social housing for those on the waiting list. It will just benefit developers.</li> <li>• We need a properly thought out housing strategy that provides the right type of houses, in the right places, for local people.</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13359
<b>Person ID</b>	924129
<b>Full Name</b>	Mrs Natalia McIntosh
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
Yes / No	
* Yes	
* No	
<b>Comment</b>	<p>Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.</p> <p>In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!</p>

In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.

The Council's proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13374

**Person ID**

1270224

**Full Name**

Ms Heather Wignall

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Heme! Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth {2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Heme! Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of

seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13386

**Person ID**

1153922

**Full Name**

Roger Hyslop

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.

Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.

In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!

In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.

The Council’s proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13402
<b>Person ID</b>	1270229
<b>Full Name</b>	Homes England
<b>Organisation</b>	
<b>Agent ID</b>	1270231
<b>Agent Full Name</b>	Ms Rebecca Dewey
<b>Agent Organisation</b>	Associate Director WSP
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13423
<b>Person ID</b>	1270261
<b>Full Name</b>	MRS SAFFRON MURRAY
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	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, Berkhams 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 a outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falli 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 pr water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs (to name but a few crucial infrastru requirements) and the detrimental impacts on our wildlife and countryside that will extend far beyond just the green belt land being concreted over.

The high levels of air pollution and the continuing lack of clean drinking water in this area have not been considered with increased breathing related illn etc, this area needs conservation not concrete.

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

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13430

**Person ID**

1270262

**Full Name**

Mr Philip Lees

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13432

**Person ID**

1270263

**Full Name**

MRS SHARON O'SULLIVAN

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	While agreeing with the principles behind the vision, serious concerns remain regarding it's implementation. Although some regeneration would be beneficial the massive growth proposed in Tring will overwhelm its historic character and is contrary to the vision of the plan that all settlements will have retained their separate and distinct identities. Despite a commitment to enhancing the natural beauty of the Chiltern Hills there are no proposals in this plan to achieve this. Whilst mitigation of harm to the natural beauty of the AONB is required under DM27 and considered necessary for the Tring allocations no evidence has been provided as to how this could possibly be achieved given the elevated nature of the AONB i.e overlooking them
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13436
<b>Person ID</b>	1270264
<b>Full Name</b>	MRS JANE BROWN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	A 9% population increase forecast for the Dacorum area by 2038 does not justify a 25% increase in housing (over 16,596 homes) as proposed for the Borough. A 9% increase can be met through development of brownfield sites in areas with existing capacity in education and health services and where there is a frequently served rail connection.

The claim made in 'Overarching Vision' - 'Environmental Sustainability' that 'The countryside will have been actively managed and enjoyed and will have continued to support a healthy local economy and diversity of wildlife' directly conflicts with the use of Green Belt land for housing, especially on the proposed scale. A perceived need to accommodate a 9% population growth does not present the 'exceptional circumstances' required for development of Green Belt for housing or the encroachment on Areas of Outstanding Natural Beauty.

The plans propose 2,700 new houses for Tring which represents a 55% increase on existing housing in this small market town. It is a far larger increase of housing than in other areas (eg. 13% in Kings Langley, Markyate and Bovington - which in itself would seem unnecessary for a forecast 9% population increase). This decision to locate such a significant proportion of the Borough's new development in Tring is totally unjustified and inappropriate, showing no consideration for the historical character of this small market town surrounded as it is by local Green Belt and important AONB.

Under 'Vision for Dacorum's Places' the proposal that Tring will 'be an inclusive market town that meets the needs and aspirations of existing and new residents and visitors' is contradicted by the proposal outlined in Tr06 for new development on the market site itself.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13455

**Person ID**

1264853

**Full Name**

Nick Davis

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The suggested allocation of 'at least' 2220 new homes for Berkhamsted is a staggering over estimation of the towns requirements. Given the requirement is to provide housing for a respectable demand, I do not believe adding 8000 people to the towns current population of less than 20000 to be strategically responsible. Considering the plans are to build on Greenbelt land on the outskirts of the town also raises concern about the strategic vision from an environmental point.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13463
<b>Person ID</b>	1270266
<b>Full Name</b>	VANDA EMERY
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>There are a number of issues with the current vision and strategic Objectives.</p> <p>1) Prioritisation of Objectives  Long terms needs to be prioritised before the short term. Enviromental Limits, particularly avoiding biodiversity collapse locally and reaching zero carbon by 2030 (as council has committed to do) need to be prioritied over all other objective. There no point having lots of shiny new homes if we don't have a stable enviroment to living them and food to eat in them. This links onto the next most important objectives, which is ensuring basic needs are meet. Dacorum is current almost totally relaite on the rest of the UK and imports from abroad to meet it's food and clothing needs. Whilst it would be silly to expect it to be self sufficient, in the face of uncertain future climate change creates (even if you we get to Zero carbon by 2030) there is a level of resilience in basic needs which is desirable. Then, and only then are 'nice to have'. Yes we should try and improve our society, built enviroment and local enviroments, and part of that is about the economy and oppurtunitys. But this has to be secondary to enviromental limits and meeting basic needs/resiliance.</p> <p>2) The objectives themselves  Given that dacorum is not an island with fixed population, the idea of "delivering homes for everyone" is rediculas. Who is everyone? Does that include all the refugee in the world looking for a home? Equally "Generating a vibrant economy with oppourtunities for all". Who is the all? current inhavitants? Any who fancy living here? This are poorly defined and ill concerved objectives. We don't need to "generate a vibrant" economy, we need to maintain and improve the one we've already got. We certainly should asipre to maximise the size of Dacorum's economy, as that would suggest that eventually we want Dacorum to become a mega city in it's own right! For objectives to be useful they need to be sperific. Say "mitigating and adapting to climate change" is vague and unhelpful. A better objective would be "Ensuring Dacorum limit's it's consmption and production GHG emission in line with limiting climate change to 1.5 degrees".</p>

3) Dacorum has been failed (like most of the county) by a national government that has failed to have a equitable approach to regional inequaility. The countries vision should be an equitable distrobution of jobs, opputunity, housing and wealth regionally, and that means investing where there is a deficit. If some parts of the UK are lacking in employment oppurtunity's, but have surplus housing, then prehaps investment to create jobs should be directed there. Is some parts of the country have some many jobs and oppurunitys that there isn't enough housing, prehaps that's a reason to avoid create jobs (and there for 'growth') in those areas.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13495

**Person ID**

1270275

**Full Name**

RICHARD ONSLOW

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The proposed expansions fot Tring and Berkhamsted are clearly out of propertion to their original sizes.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13499

**Person ID**

1270278

**Full Name**

CHRISTOPHER COOK

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

* Yes	
* No	
<b>Comment</b>	NO. The plans Dacorum are excessive and takes away from the charm and individuality of our small towns.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13510
<b>Person ID</b>	1270285
<b>Full Name</b>	MARTIN WELLER
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13524

**Person ID**

1270291

**Full Name**

Mr Mark Smith

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I don't think the vision is right for the Borough – 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>I am particularly against BK-01 the land south of Berkhamsted – 1000 houses shoe-horned onto those two fields with no added schools, doctors, playing areas etc will have a very disruptive effect on that part of town not to mention the total loss of fields that are used regularly by lots of people, including my family.</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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13534
<b>Person ID</b>	1270293
<b>Full Name</b>	Brian Hartley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Comment</b>	<p>It is very unfortunate -----and in my personal view <b>very lacking in the duty of DBC in serving the people of Dacorum----- that the DBC Councillors did not chose to postpone the consultation until we are closer to the end of the Covid Pandemic</b> –perhaps postponing till into 2022.</p> <p>The last few years with Brexit and now Covid with the ensuing uncertainties for families and the economy ---means now is not a time for DBC to attempt to ‘Steam Roller’ through plans or drive ‘Tanks’ through the wishes of the people of Dacorum.</p> <p>Further to this, on the premise that some new <b>affordable housing</b> is needed in Dacorum, rather than plan to create ‘Urban Sprawl’ into greenbelt land it would be prudent to defer planning well into 2022 to take account of shopping premises , office buildings, factory and brownfield sites that are likely to become vacant following the aftermaths of Brexit and Covid and changes in working and shopping behaviour plus the effects upon Berkhamsted Town Centre and roads / side roads should many persons continue to work from home and no longer regularly commute to cities.</p> <p>I have been following the ‘Berkhamsted Residents Action Group (BRAG)’ responses in full to the consultation and along with my personal, perhaps additional, views above I wish to add that I support the response of ‘BRAG to the consultation and to avoid duplication I request you accept this as confirmation <b>that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>On a final note it would be interesting to see the envisaged (from the current proposed plans of both DBC and the Developers) full ‘Money Trail’ –projected / planned amounts where coming from where going ---for all aspects involved from land sale, infrastructure changes, housing development and sale through to expanding services provided by councils and DBC to serve the additional homes and people in the communities.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13536
<b>Person ID</b>	1260521
<b>Full Name</b>	Steve Ritchie
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	
<b>Comment</b>	<b>Climate Change Emergency</b>

The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.

The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.

### **Overarching Vision: Environmental Sustainability**

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

### **Overarching Vision: Economic Growth**

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

### **Berkhamsted & Tring Developments**

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13558
<b>Person ID</b>	1270302

<b>Full Name</b>	Ms Hannah AlQadhi
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>DBC overstates the housing need.</p> <p>Brexit, the pandemic and the net export of people from the UK will impact on the already slowing in the UK's population increase.</p> <p>Some reports, for instance South West Herts Local Housing Needs Assessment Final Report - September 2020 (PDF 2MB), covering neighbouring councils such as St.Albans as well as Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."</p> <p>There is certainly no extraordinary need for the Green Belt to be encroached and these plans should be stopped immediately.</p> <p>A significant volume of housing has been built in Northchurch and Berkhamsted in recent years without the infrastructure to support such increases in the population. The local infrastructure simply cannot support further building / population growth.</p> <p>Further housing developments / population growth will negatively impact upon the character of Northchurch and Berkhamsted.</p> <p>DBC is wrong in presenting Northchurch as West Berkhamsted in its plans. It is a village. It is defined as a village, has its own parish council and one of the oldest churches in Hertfordshire. In fact Northchurch predates Berkhamsted and DBC should apply its own policy for village development and remove its proposal to build on its Greenbelt, in particular BK06 and BK07.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13570
<b>Person ID</b>	1227768
<b>Full Name</b>	Ms Denise Young
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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, Berkhams 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 a outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falli 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 pr water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs (to name but a few crucial infrastru 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 high levels of air pollution and the continuing lack of clean drinking water in this area have not been considered with increased breathing related illn etc, this area needs conservation not concrete.</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 exis and infrastructure.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS13584
<b>Person ID</b>	1270310
<b>Full Name</b>	Ms Eleanor Jelf
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I object to Dacorum's Emerging Strategy for Growth on a number of grounds.</p> <p><b>Green Belt:</b> This plan presents a significant threat to the Green Belt and also, by proximity, to the Chilterns AONB. The council has not shown 'exceptional circumstances' to justify Green Belt release. There is no consideration of sustainable development - these proposals have not been made with future generations in mind, the loss of Green Belt will be irreversible and damaging. If implemented, these proposals would result in the loss of a massive 850 hectares of Green Belt, wider countryside and urban green space - this would cause irreparable harm to the environment, ignoring the council's own climate emergency declaration.</p> <p><b>Climate Emergency:</b> The Climate Change Emergency needs to be at the core of the Local Plan. There is little detail regarding this subject only vague unquantified aims.</p> <p><b>Environmental Sustainability:</b> The promotion of renewable energy as proposed in the plan is inadequate. In order to achieve net zero emissions by 2030 the council needs to ensure that new buildings are built with high levels of insulation and air tightness (and manually controlled ventilation for post-COVID era), and that they make use of solar panels, heat pumps and other renewable energy provision. The plan would look more environmentally sustainable if there was planned provision for electric public transport vehicles, ubiquitous electric vehicle chargers and increased electricity supply from renewable sources.</p> <p><b>Overprovision of Housing:</b> The housing targets are too large, they are based on out-of-date data and they have not been considered within the context of the constraints imposed by an area that is 85% rural, 60% Green Belt and 33% AONB. Furthermore, these proposals underestimate the potential to provide housing on existing developed sites, nor do they take into account recent government changes to permitted development rights (allowing conversion of commercial premises to residential use) at a time when Covid-19 has forever changed office and commuter work patterns, allowing</p>

an escape from London-centric over-development in the South-East and permitting investment and levelling up across the country.

Finally, the huge impact on local infrastructure has been disregarded - the proposed level of development would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan does little to address improvements required to support these proposals - with water supply and waste water disposal being of particular concern.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13623
<b>Person ID</b>	1145871
<b>Full Name</b>	Mr Gareth Morris
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan, a 25% growth (16,596 house) in housing, there is no evidence to support this 25% growth, especially considering there is a 9% (5,590 houses) population growth forecast by the ONSS in Dacorum for the same period.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead, a 23% growth (10,600 houses) in housing, but strongly object to the substantially disproportionate growth strategy for housing within Tring (55% growth).</p> <p>I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough, a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more evenly.</p> <p>The proposed new development in Tring would directly contradict the Council's stated policies and the aims of the Sustainable Transport Study for Berkhamstead and Tring. Even a significant improvement in bus services from its current</p>

marginal status will have little impact on car use as, despite the huge scale of proposed housing building for Tring, services could not be justified to the extent that using buses would become a practical or popular choice for commuting, school runs or daytime travel. The opportunity for improved cycle routes around Tring that are considered safe and convenient enough for significantly greater use is limited by lack of space along the narrow streets and roads, lack of segregation from road traffic and lack of maintenance. The scope for additional use of the rail network will also be limited by current overcrowding and the ease of access at destination locations. Hemel Hempstead station for example is located between 1 and 3 miles from most areas of employment. In practice every new house built in Tring will result in around two additional cars travelling on local roads twice a day. Paragraph 21.1 of the consultation states that Dacorum has good transport links, but that statement is contradicted by paragraph 21.2, the transport links already become hopelessly congested on a regular basis. The A41 in particular was designed for far lower traffic levels than it currently handles, with no hard shoulder and dangerously short slip roads. The result is that even a flat tyre leads to a lane closure and traffic delays of around 45 minutes at peak periods. The consequence of this, beyond social wellbeing and economic, is the diversion of huge levels of traffic onto smaller roads through Tring or Berkhamstead. Adding another 5000 to 8000 car journeys onto the A41 each weekday will have untold consequences on the local environment, quality of life and directly contradicts Policy DM50 'locate development in areas that provide good levels of access to sustainable modes of transport', Policy DM52 'encourage reduced car ownership', DM60 Health Impact, DM35 NOx emissions, (especially on Northchurch High Street AQMA) and noise pollution (already intrusive on Station Road and A41). It would also greatly increase the challenge to policy DM32, significantly increasing the pressure on Ashridge Estate through increased population and removal of a popular walking area to the east of Tring. The huge impact to the character and integrity of Tring as a unique and historic market town would also make a mockery of policies DM43 and 44, intended surely to protect such an historic environment

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS13636

**Person ID** 1270343

**Full Name** KEITH DELDERFIELD

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

## Comment

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I would call for fewer houses to be built on green belt land and for the Local Plan to have the climate emergency fully integrated into its targets and objectives. I strongly object to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock. 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 simplistic algorithm.

The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects.

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, as recommended by national planning guidance. This draft Local Plan fails to demonstrate a pathway to local zero carbon or enhancements to biodiversity. The plan is unambitious and does not commit to any level of sustainability in its sustainability targets. The proposed plan has clearly prioritised house building growth over considerations for the climate emergency.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13668

**Person ID**

1207133

**Full Name**

Chilterns Conservation Board

**Organisation**

Chilterns Conservation Board

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes  
\* No

**Comment**

We object to parts of the vision as expressed on pp.22-24.

The overarching vision is rightly a political (small “p”) expression of the aspirations held by the community as expressed by the council. The CCB has no reason to dispute the aspirations themselves or the principles behind them. The vision is felt to represent a positive and locally distinctive set of aspirations for Dacorum, recognising the character and function of different areas of the Borough.

We are pleased with the statement that “The natural beauty of the Chiltern Hills and the varied character of the countryside will have been enhanced, and continued to be admired and cherished”, and the emphasis on enhancement is particularly to be welcomed, as are the aspirations for woodland, streams and the historic environment, both inside and outside of the designated AONB.

Chilterns Beechwoods SAC

It is a shame, however, that the same aspiration for enhancement of these environmental assets is not applied to the area’s most sensitive habitat, and we are extremely disappointed that the only aspiration for the Chilterns Beechwoods SAC is that the impacts of growth on these internationally recognised habitats will be “effectively mitigated”.

The CCB objects to this wording (last sentence of the second paragraph under “Environmental Sustainability”). To “mitigate” is something is merely to make it less harsh, and this aspiration in effect says that the SAC will not be as badly destroyed as it might have been. A spatial vision should be aspirational, representing the best realistic outcome anticipated by the community. Rather than setting a bar for the SAC as low as “not as much harm as it could have been” the vision should surely anticipate that “the Chilterns Beechwood SAC is a thriving habitat that is in a better condition than when it was designated, with nearby areas actively being restored to the same high environmental standard”.

Vision for Dacorum’s places

The (separate) “Vision for Dacorum’s places” is also disappointing in that, while it gives an excellent account of the distinctive aspirations for the Borough’s three principal settlements, the vision for “the countryside and other small villages” is very weak: such areas are about more than just being protected while allowing a little farm diversification.

This section could be improved through:

- reference to different aspirations for the AONB and the Green Belt areas (e.g. as expressed in the relevant chapters of the plan as well as in other parts of the vision);
- recognising the range of functions that are important in terms of e.g. food production, tourism and natural capital, as well as contributing to the area’s prosperity and the well-being of its citizens;
- ascribing an economic role to the smaller villages, none of which are merely dormitories or retirement homes for the other towns.

CCB’s officers would be willing to assist with developing this part of the vision.

Strategic Objectives

Object. (pp.25-26)

For the most part the objectives appear to be consistent with achieving the Vision and are reasonable in themselves. They contain specific objectives (e.g. under the natural environment heading) consistent with the conservation and enhancement of the natural beauty of the Chilterns AONB.

However, we draw attention to the first objective (to “deliver the identified housing requirement between 2020 and 2038”) and emphasise that in this context, the “identified housing requirement” must refer to the requirement identified as representing sustainable development for the Borough, and not to the (separate) centrally-determined assessment of local housing need from which the requirement is derived.

It might be more appropriate to express this objective in terms of delivering housing sufficient to meet the needs of the Borough’s citizens, plus a level of growth to support economic regeneration that is consistent with other objectives of the local plan. This would be more consistent with other objectives for promoting development, such as those under the “vibrant economy” heading, which do not specify a particular quantum of development that needs to be met. It is easy to envisage any of the economic objectives being met without necessarily conflicting with other objectives of the plan – not so with the housing objective.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13696

**Person ID**

1270359

**Full Name**

Mr John Dowling

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

It is essential that a Vision and Strategic objectives are agreed and in place before any development takes place.

Although i live just outside the Borough, actions and activities taken by DBC may well have a significant effect on me and my neighborhood, particularely the Proposal for Long Marston.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13701

<b>Person ID</b>	1270361
<b>Full Name</b>	Mr Jon Whysall
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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. 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.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13707
<b>Person ID</b>	1263002
<b>Full Name</b>	Rhona Denness
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>In this document I am replying personally as a resident of Tring, and will draw on a combination of my own responses to the Draft Local Plan, as well as endorsing and using some responses from Tring in Transition, The Grove Fields Residents Association, CPRE and Dacorum Green Party.</p> <p>The overarching vision and strategic objectives seem positive and useful but do not match the proposed actions or level of detail within the document. I find that the words used (e.g. ‘to protect and enhance natural beauty and varied character of the countryside’ or to ‘provide environmentally sustainable growth’ ) are just words which are not supported in the actual development plan.</p> <p>For example, the proposal for increased housing in Tring and use of Green Belt land appears to directly go against the principles of a) conserving and protecting the natural environment, b) mitigating and adapting to climate change and c) promoting the distinctiveness of towns and villages, and d) protecting and enhancing Dacorum distinctive historic environment.</p> <p>The housing allocation set for Dacorum is unreasonably high. The Local Plan 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. This growth in household numbers is a 25% increase over the current housing stock. 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 simplistic algorithm.</p> <p>The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects. The plan does not therefore demonstrate evidence for objectively assessed need.</p> <p>Within the overall housing plans within Dacorum, the proposed number of houses suggested for Tring are highly disproportionate representing a 55% increase in housing (2700 houses).</p> <p>This assessment of housing need then places a significant risk to the heritage of the area, protected landscapes and Green Belt.</p> <p>Any new development on sites to the east of Tring intrinsically would fail to take account of sensitive views, landscape and protected environmental sites. The governments own advice says that ‘meeting housing need is never a reason to cause unacceptable harm to such places’. No evidence to justify unquestionable damage to Green Belt and AONB is given.</p> <p>The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth in Tring has not been sufficiently justified and as such the by product of the schools are unlikely to be necessary.</p> <p>The delivery of open space and sports and leisure facilities is a good aim. However the Local plan suggests however taking away widespread open countryside and land which contributes to the AONB. This would be a very significant loss</p>

which would defeat the object of seeking to secure new space and leisure facilities for the health and wellbeing of local people. The document appears to confuse and conflate the provision of playing fields or linked green areas to wildlife corridors and attempts to reduce biodiversity loss.

The Local Plan has an overarching aim of ensuring developments protect and enhance the distinctiveness and historical importance of towns and villages. This seems completely at odds with the proposed plans for Tring in particular, where bolted on developments are likely to significantly detract from the distinctiveness of a small historic market town surrounded by AONB, Green Belt and SSSI's. It is likely to detract significantly from the enjoyment, health and well being of current and future residents.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13742

**Person ID**

1270368

**Full Name**

Mr Charlie Laing

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files****Consultation Point** Borough Vision to 2038**Comment ID** EGS13777**Person ID** 1270380**Full Name** Mrs Samantha Weston**Organisation****Agent ID****Agent Full Name****Agent Organisation****Yes / No** No

\* Yes

\* No

**Comment** (no comment)**Included files****Consultation Point** Borough Vision to 2038**Comment ID** EGS13785**Person ID** 1264810**Full Name** Julia Margree**Organisation****Agent ID****Agent Full Name****Agent Organisation****Yes / No** No

* Yes	
* No	
<b>Comment</b>	<p>I am deeply saddened by the prospect of the considerable development of greenbelt land in Dacorum, and I fear it could be something that drives my family out of the area. We live in an area with beautiful green space which we love seeing people of all ages enjoy. Each lockdown has emphasised the importance of this space is to the local community - it provides so much benefit to people's mental and physical health.</p> <p>We are due to move to Boxmoor next month. Again, this area has outstanding natural beauty and it's green spaces and parks are the hub of the community. I am very familiar with this area, and already parking is an issue in this area.</p> <p>I am also greatly concerned about the impact on the environment caused by the loss of green space. Such development feels like an enormous step backwards in the fight against climate change, not to mention the impact of the increased emissions from a denser population. Can the infrastructure really cope with the increase in housing? What about water supplies? I fully understand that everyone should have access to affordable housing, but the use of precious and vital greenbelt land for large housing does not appear to be a solution to the affordable housing problems.</p> <p>Sadly, Dacorum is already lacking in good secondary education provision, and this can surely only become worse (particularly due to the lack of provision for this in the early phases), with the additional pressures that a significantly larger community will bring.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13787
<b>Person ID</b>	
<b>Full Name</b>	
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	

<b>Comment</b>	<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 high levels of air pollution and the continuing lack of clean drinking water in this area have not been considered with increased breathing related illness, asthma etc, this area needs conservation not concrete.</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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13801
<b>Person ID</b>	1163978
<b>Full Name</b>	John Wignall
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the

existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13812

**Person ID**

1270385

**Full Name**

Ms Katy Regan

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

No, simply building more and more homes in Dacorum will not provide any noticeable depressive effect on house prices in the area, it will rather attract more people from London to buy here. This does nothing to reduce the numbers on our housing list, and very little to address the specific housing needs of Dacorum.

This consultation was originally for the period 27th November 2020 to 7 February 2021, but this was extended on 13 January up until the 28 February. However, the country is still under a COVID lockdown, and people are not allowed to leave their houses unless necessary. Whilst the consultation is available online, it is clear that the individuals who are

not able to access it properly include those who are most at risk from this disease, and advising people in risk categories 1 -4 to go to the library to access the documents is nonsensical. The consultation ought to be extended to 6 weeks after the current lockdown has ended so that those without access to appropriate technology are included.

In addition, much of the work done on the local plan was carried out before COVID-19 and the consideration of changes in lifestyle as a result of the pandemic and arising from it have not been included in arriving at this plan for how Dacorum will grow and change over the next 18 years. This is a major flaw in the plan, and it is vital that this is rectified.

The Emerging Local Plan provides for too many houses overall, and insufficient social housing. The number of houses calculated by the Standard method, has changed during the course of the consultation,

Initially, the Standard method that required a 2.6 fold increase in our housing numbers from the Objectively Assessed projections from the ONS 2018. This meant that our projection of 355 dwellings per year was increased to 922. The algorithm which caused this unrealistic uplift was widely criticized and has been abandoned. Whilst it is positive that the original algorithm for the Standard method, which limits the increase to 1.4 fold the ONS figure has been readopted, it is not clear why out of date figures (2014) from the ONS are required to be used, when there are more recent projections. The result of this is that our housing target figure has increased to 1023, and this is both completely out of step with the actual need for new homes in Dacorum, AND a target so large that it risks large amounts of countryside, the amalgamation of our distinct settlements and fundamentally flies in the face of national climate change commitments.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13823
<b>Person ID</b>	1207914
<b>Full Name</b>	Maria Oliver
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Too many additional houses per year Too low a proportion of social housing or affordable housing

922 houses a year is disproportionate and excessive. The latest Office for National Statistics states that Dacorum's Housing need is 355 houses a year, so adding nearly 600 houses per year to what our area needs is well beyond what is required.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS13829

**Person ID** 777073

**Full Name** Mrs Anne Lyne

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment** The plan itself does have many positive aspects and aspirations. However, experience shows that many of the aspirations quickly drop away when the developers get their say. The housing targets are set at an unnecessarily high level.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS13844

**Person ID** 1270387

**Full Name** Mr Richard Pilkinton

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

No

<b>* No</b>	
<b>Comment</b>	<p>The vision of promoting the distinctiveness of each of Dacorum's towns and villages does not take account of development under the previous plan and the impact that has already happened. This includes the adverse impact on the character of Markyate and on the increase in carbon emissions locally.</p> <p>The vision is not based on latest housing needs information and includes building on Green Belt land right up to the Chilterns area of Outstanding Natural beauty. This Green Belt land should not be built on; the Plan to do so does not represent my vision for an area that I have lived virtually all my life in.</p> <p>It is inevitable that the vision in the Dacorum Local Plan will focus on Hemel Hempstead and the towns of Berkhamsted and Tring which are all on the A41 and the rail link to London Euston station. However, there needs to be more thought given to the rural areas abutting on neighbouring counties, not just other regions of Hertfordshire and where walking or cycling to the towns of the Borough is impractical due to their distance from the towns and the hilly nature of the land outside the valley used by the A41 and the railway.</p> <p>The vision of the Local Plan needs to include looking to the needs and aspirations of the whole Borough and individual communities within it.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13859
<b>Person ID</b>	611689
<b>Full Name</b>	Mrs Sheila Pilkinton
<b>Organisation</b>	Markyate Parish Council
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> <b>* Yes</b> <b>* No</b>	No
<b>Comment</b>	<p>The vision of promoting the distinctiveness of each of Dacorum's towns and villages does not take account of development under the previous plan and the impact that has already happened. This includes the adverse impact on the character of Markyate and on the increase in carbon emissions locally.</p> <p>The vision is not based on latest housing needs information and includes building on</p>

Green Belt land right up to the Chilterns area of Outstanding Natural beauty. This Green Belt land should not be built on; the Plan to do so does not represent my vision for an area that I have lived virtually all my life in.

It is inevitable that the vision in the Dacorum Local Plan will focus on Hemel Hempstead and the towns of Berkhamsted and Tring which are all on the A41 and the rail link to London Euston station. However, there needs to be more thought given to the rural areas abutting on neighbouring counties, not just other regions of Hertfordshire and where walking or cycling to the towns of the Borough is impractical due to their distance from the towns and the hilly nature of the land outside the valley used by the A41 and the railway.

The vision of the Local Plan needs to include looking to the needs and aspirations of the whole Borough and individual communities within it.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13874

**Person ID**

1270388

**Full Name**

Mr & Mrs David & Emma Robertson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovington, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS13885

**Person ID**

1264756

**Full Name**

Kathryn Salway

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Climate Change Emergency

The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.

The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow-through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas ("GHG") emissions.

Overarching Vision: Environmental Sustainability

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with carbon-neutral efficient heating such as air source heat pumps. All public transport must be electrified. At construction, provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

#### Overarching Vision: Economic Growth

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

#### Berkhamsted & Tring Developments

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring, but believe that 'affordable' needs to be properly defined in the plan and that the 'affordable housing' must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13910
<b>Person ID</b>	1207810

<b>Full Name</b>	Louisa Groves
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Overall, the quantity of housing being proposed is insanely high. It is irresponsible for the council to suggest such housing growth when a climate emergency was declared in 2019! How can you increase housing by 28% and work on net zero climate change? There is already not enough water in the chalk beds and the increase in housing that has been suggested will simply exacerbate this issue. I have been involved in previous consultations leading up to this proposal and feel as a resident of Dacorum that my views have not been listened to at all.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13921
<b>Person ID</b>	1270392
<b>Full Name</b>	Ms Anna Skingley
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan, a 25% growth (16,596 house) in housing, there is no evidence to support this 25% growth, especially considering there is a 9% (5,590 houses) population growth forecast by the ONSS in Dacorum for the same period.  I agree with the plan's approach to prioritise housing growth in Hemel Hempstead, a 23% growth

(10,600 houses) in housing, but strongly object to the substantially disproportionate growth strategy for housing within Tring (55% growth).

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough, a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more evenly.

The proposed new development in Tring would directly contradict the Council's stated policies and the aims of the Sustainable Transport Study for Berkhamstead and Tring. Even a significant improvement in bus services from its current marginal status will have little impact on car use as, despite the huge scale of proposed house building for Tring, services could not be justified to the extent that using buses would become a practical or popular choice for commuting, school runs or daytime travel. The opportunity for improved cycle routes around Tring that are considered safe and convenient enough for significantly greater use is limited by lack of space along the narrow streets and roads, lack of segregation from road traffic and lack of maintenance. The scope for additional use of the rail network will also be limited by current overcrowding and the ease of access at destination locations. Hemel Hempstead station for example is located between 1 and 3 miles from most areas of employment. In practice every new house built in Tring will result in around two additional cars travelling on local roads twice a day. Paragraph 21.1 of the consultation states that Dacorum has good transport links, but that statement is contradicted by paragraph 21.2, the transport links already become hopelessly congested on a regular basis. The A41 in particular was designed for far lower traffic levels than it currently handles, with no hard shoulder and dangerously short slip roads. The result is that even a flat tyre leads to a lane closure and traffic delays of around 45 minutes at peak periods. The consequence of this, beyond social wellbeing and economic, is the diversion of huge levels of traffic onto smaller roads through Tring or Berkhamstead. Adding another 5000 to 8000 car journeys onto the A41 each weekday will have untold consequences on the local environment, quality of life and directly contradicts Policy DM50 'locate development in areas that provide good levels of access to sustainable modes of transport', Policy DM52 'encourage reduced car ownership', DM60 Health Impact, DM35 NOx emissions, (especially on Northchurch High Street AQMA) and noise pollution (already intrusive on Station Road and A41). It would also greatly increase the challenge to policy DM32, significantly increasing the pressure on Ashridge Estate through increased population and removal of a popular walking area to the east of Tring. The huge impact to the character and integrity of Tring as a unique and historic market town would also make a mockery of policies DM43 and 44, intended surely to protect such an historic environment

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13932
<b>Person ID</b>	1145435
<b>Full Name</b>	Mr Paul Crosland
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	Dacorum Borough Council's overarching vision for the period of the Local Plan of improving environmental sustainability, achieving economic growth and improving the well-being of its residents is laudable. The detail set out in the Plan, however, appears to work against these aims and promotes over-development in many areas of the Borough, with extensive house-building in Hemel Hempstead, in the market towns of Berkhamsted and Tring and to a lesser extent in other towns and villages.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13953
<b>Person ID</b>	1270381
<b>Full Name</b>	Alexandra Das-Crosland
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	Dacorum Borough Council's overarching vision for the period of the Local Plan of improving environmental sustainability, achieving economic growth and improving the well-being of its residents is laudable. The detail set out in the Plan, however, appears to work against these aims and promotes over-development in many areas of the Borough, with extensive house-building in Hemel Hempstead, in the market towns of Berkhamsted and Tring and to a lesser extent in other towns and villages.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS13974
<b>Person ID</b>	1270411
<b>Full Name</b>	Ms Jacqui Parr
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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. 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.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS13986
<b>Person ID</b>	1270412
<b>Full Name</b>	James Mullins
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14002
<b>Person ID</b>	1270423
<b>Full Name</b>	BERNAREGGI GRAZIA
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Too much use of green belt for no reason.</p> <p>Over expanding Northchurch which will lose its rural setting. Northchurch will be merged into Berkhamsted losing its own identity.</p> <p>There will be even more traffic increasing pollution on Northchurch High Street and creating even more road safety issues on Darrs Lane.</p> <p>The sunken lanes of Bell Lane and Darrs Lane with their ancient hedges will be lost.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14010
<b>Person ID</b>	1146072
<b>Full Name</b>	Helen Cole
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>This plan was devised before the recent government changes to planning guidance and does not seem to have been amended as a result. As part of the 'levelling up agenda' we should be looking at developing more places to live and work in the North of the country rather than further developing the already overcrowded South East. Secondly it does not take into account changes in</p> <p>lifestyles as a result of the Covid 19 pandemic. It is very likely that more people will be spending at least part of the week working from home in the future, rather than commuting every day, and therefore proposed housing density should be reduced to allow people the space they need. We know that people value garden space more now than in the past, and yet this plan agrees to an increase in permitted housing density. This will result in developers building houses that do not properly meet people's needs.</p> <p>We know we are facing a climate crisis, in the UK we have committed to net zero by 2030, and yet there is nothing that I can see in this plan that says that all new housing must meet standards to support this. As a minimum we must have infrastructure to support our climate change goals.</p> <p>Houses must be built to the highest 'green standards we must have a commitment that no natural gas supplies are provided to these homes, that each has a heat pump and solar panels.</p> <p>Every home should have an electric charging point. This should all be explicitly described in the plan.</p> <p>I note that the plans propose significant building on green belt. The statements say that this can only be done in 'exceptional circumstances; but that these exceptional circumstances have been established. There is no detail on how these have been established. If green belt it to be built on I would argue that it would make much more sense to build a new town or towns to meet any future</p>

housing needs. That way the development is planned properly with all the amenities required for modern living, rather than bolting on to an existing one which was never designed to be so large. This ensures that roads, cycle lanes, train stations and open spaces are adequate by design, that schools are available providing enough places and doctors surgeries are adequate. In bolting on to an existing town there is inevitable loss of amenity for existing residents as more pressure is put on roads, schools and healthcare and the additional pressure is often not adequately considered .

I do agreed with the statement that 'All of this needs to be done in a way that maintains and enhances the outstanding qualities of Dacorum – its vibrant communities, high quality countryside and being a great place to live, work and enjoy'.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14016

**Person ID**

1270425

**Full Name**

EMMA LELIEVELD

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

There are a number of inconsistencies and muddled thinking in the draft Local Plan that are baffling to residents of the ridge area of Berkhamsted (i.e.: Shootersway and neighbouring streets) where a significant number of new dwellings is proposed. This needs revisiting before the plan progresses to the pre-submission phase. In particular:

- 1 There is a discrepancy between the proposed increases in dwellings set out in the draft Local Plan and the projections by The ONS projects a significantly lower housing need in this area.
- 1 DBC's sole justification for accepting Government's numbers (922 new dwellings per year) as a strict target is that "Any option below the standard methodology would have to be robustly justified" (paragraph 5.8 of The Development Strategy Background Topic Paper). Government has, however, put it on the public record that the numbers are not targets and Green Belt should be afforded the highest protection. It is therefore not at all clear why DBC has

felt unable or unwilling to make a case that can be “robustly justified”. This should be revisited given the weight of evidence to the contrary.

- 1 The open valley sides and ridge top location have previously been identified as “especially sensitive to new building” and the Council had previously concluded from this that “development in these locations will not be supported. It now seems, however, that the 2013 Core Strategy vision

of “maintaining the strong valley and linear character of the settlement” has been abandoned and that - 8 years on and after considerable further impactful development within the current Plan - Dacorum Borough Council (DBC) now promotes parcels of land in these areas for removal from the Green Belt and suggests that development can now be built” in a way that takes account of sensitive views and landscape”.

- 1 The town experiences a high level of congestion. The Council has previously concluded there are few opportunities for new road capacity in the town. The consultation document states “All growth areas will be required to provide for on- and off-site measures to alleviate highway local highway problems” yet no explanation has been provided as to how Berkhamsted's road and transport system to and from the ridge area could be adapted to cope with the additional journeys that will be generated by so much development.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14025

**Person ID**

**Full Name**

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

No

**Comment**

The Dacorum Local Plan Emerging Strategy for Growth 2020-2038 lacks creativity and imagination.

It is not clear from the data where the housing numbers come from. They seem to be Government numbers that have been accepted without demur. The Leader of Dacorum Council wrote to the Secretary of State on 30 November 2020 noting the unanimous vote of the Council on 18 November to request a reduction in the numbers. For reasons that need to be made public this request was rejected.

The projections seem to take little account of the changed circumstances in demand that can be expected post-pandemic (see Question 2).

Also, the type of housing and the implied density seems to be inadequate for future needs.

Furthermore, the Plan places far too much emphasis on Green Belt development (60%), which is inappropriate in Dacorum, especially in Tring and environs given its proximity to the Chilterns AONB.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14031

**Person ID**

1270428

**Full Name**

KIERAN HOLLAND

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**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, Berkhams 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 a outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falli 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 pr water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs (to name but a few crucial infrastru requirements) and the detrimental impacts on our wildlife and countryside that will extend far beyond just the green belt land being concreted over.

The high levels of air pollution and the continuing lack of clean drinking water in this area have not been considered with increased breathing related illn etc, this area needs conservation not concrete.

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

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14038

**Person ID**

1270471

**Full Name**

PHILIP HICKS

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14043

**Person ID**

1264962

**Full Name**

Courtney Culverhouse

**Organisation**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Dacorum's Local Plan doesn't address the climate emergency that we're facing or commit to any level of sustainability in its sustainability goals. The Local Plan should prioritise affordable zero carbon sustainable homes - rather than prioritising economic growth over the climate emergency.</p> <p>Other local authorities in England (Greater Cambridge, Reading and Liverpool City) have developed local plans that take into account climate change, biodiversity, well-being and social inclusion.</p> <p>Therefore, this should be included in Dacorum's approach.</p> <p>I would like the recommendations of Dacorum Green Party to be listened to e.g. buildings to be externally certified to sustainable standards, a net zero building process, electric vehicle chargers, natural ventilation, solar PVs, collection of rain water for toilets and top class insulation.</p> <p>I would also like to see proper consideration of the pressure on water suppliers, traffic, medical facilities, recreation, recycling centres and employment needs. I have particular concern regarding Tring, which is a small town that cannot accommodate higher levels of traffic (both vehicle and pedestrian) and I believe this lovely town will be ruined by the proposed Local Plan.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14061
<b>Person ID</b>	1270476
<b>Full Name</b>	ALISON CHESHIRE
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>No, I don't. Building more houses within the London commuter belt will not reduce house prices for local people looking for their first property in their hometown. Instead, it will attract more commuters moving out from London.</p> <p>Developer led housing will not provide more social housing for those on the waiting list, it'll just line the pockets of greedy developers.</p> <p>We need a properly thought out housing strategy, based on actual, not flawed, out of date, data.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14073
<b>Person ID</b>	1270478
<b>Full Name</b>	HANSEN L & H
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I do not agree with the Borough's vision for 2038, in particular in relation to Berkhamsted. The excessive increase in housing numbers is unrealistic and inappropriate and will have a huge negative impact on the environment and its residents. The majority of the proposed housing will be at the top of the valley and some distance from the town centre causing a significant increase in car use. As Berkhamsted is in a valley with narrow roads, it doesn't have the road infrastructure to cope, nor the ability to create it. There will be a large increase in congestion and air pollution. Dozens of schools in Dacorum are already in areas with dangerous levels of air pollution and with a huge amount of proposed housing built near schools (eg. Swing Gate, Thomas Coram, Ashlyns) this is only likely to worsen.</p>

It appears to be a developer led strategy with no focus on what the residents of Berkhamsted really need. There are no exceptional circumstances to justify the huge reduction of Green Belt. The council needs to think outside the box to ensure the right amount and the right type of houses will be built.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14089

**Person ID**

1261168

**Full Name**

Pat Whiteman

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The overarching vision, the vision for Dacorum's places and the strategic objectives for the Borough are all fundamentally flawed. I support the submissions from 'Tring in Transition' and 'Chiltern Countryside Group'. I urge you to take note of the substantial number of points made in these documents that demonstrate the inaccuracies, inconsistencies and total lack of detail provided in the plan.

The scale of the proposed development is not supported in general, and specifically for Tring. It is disproportionate and will destroy Tring as a market town. No evidence is presented for the assertion that Tring and Berkhamsted should play a greater role in delivering growth. This is totally contrary to previous conclusions and is not consistent with research findings that show larger scale settlements like Hemel Hempstead are much more viable. The plan is totally inconsistent with it's own expressed aim to minimise development on the Green Belt.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14101

**Person ID**

1207309

**Full Name**

Ms Andrea Gilmour

<b>Organisation</b>	Property Planning Manager Hertfordshire County Council
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14104
<b>Person ID</b>	1270501
<b>Full Name</b>	DAVID WHITE
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Northchurch Parish Council (NPC) has not found one person who believes that Dacorum's vision or strategic objectives are right for the Borough.</p> <p>The views of Northchurch residents reflect those of the country at large. For example, In October 2020, when the government consulted on its proposed changes to the planning system, respondents expressed concerns that "the distribution of need was not right...too much strain was being put on our rural areas, and ... "in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt."</p> <p><a href="https://www.gov.uk/government/consultations/changes-to-the-current-planning-system">https://www.gov.uk/government/consultations/changes-to-the-current-planning-system</a> to come government response to the local housing need proposals and changes to the current planning system</p>

The views of Northchurch residents also reflect those of people across the Borough. For example, only 5% of people who responded to Dacorum's 2017 Local Plan Issues & Options agreed with Dacorum's proposed approach to Green Belt and Major Developed Sites.

[http://www.dacorum.gov.uk/docs/default-source/strategic-planning/appendix-6-q9-to-q11-i-and-o-consultation-report-of-responses-september-2019.pdf?sfvrsn=6b530c9e\\_6](http://www.dacorum.gov.uk/docs/default-source/strategic-planning/appendix-6-q9-to-q11-i-and-o-consultation-report-of-responses-september-2019.pdf?sfvrsn=6b530c9e_6)

NPC believes that Dacorum's vision is fundamentally flawed because it is based on out-of-date 2014 household projections which over-estimate demand and prioritise growth at the expense of other considerations such as the importance of the Green Belt:

Dacorum's Vision 1.37: "For housing, we are making a bold commitment to significantly increasing the supply of land to deliver 922 dwellings per year, more than double the number (430 dwellings per year) in the previous Core Strategy."

None of Dacorum's Borough Councillors appear to agree with this "bold commitment" to double the of dwellings. On 18 November 2020, Dacorum Borough Councillors voted unanimously in favour of a motion expressing concern about the effects on the borough of having to deliver 922 dwellings per year. On 20 November 2020, the Leader of Dacorum Borough Council wrote to the Secretary of State saying that the housing figure was too high and would harm the Green Belt:

"At the moment the housing target generated by both current and proposed standard housing methodologies ignore these constraints and produces a figure well in excess of the Office of National Statistics projection of housing need based on the 2018 figures, if this is accepted it would result in a reduction in the annual target and therefore would help to reduce the current figure suggested for Dacorum which is currently 922 per annum, a level of growth that can only be achieved with significant development in the Green Belt".

So, neither councillors nor residents, support this vision.

The vision would have a devastating effect on the 2800 people who live in Northchurch. New developments would add over 1500 new residents to Northchurch, a population increase of over 50%. The additional buildings and residents would destroy the semi-rural character of Northchurch and the quality of life for local people.

Northchurch is a large village with its own distinct appearance, community, and semi-rural character but the vision does not even mention Northchurch; it has been whitewashed from existence.

Northchurch predates the neighbouring town of Berkhamsted. The parish church of St. Mary is one of the oldest churches in Hertfordshire; and the two-storey half-timbered alms-houses in the Conservation Area were built in the 15th and 16th centuries. Northchurch has two conservation areas and includes the hamlets of Dudswell, Norcott Hill, Northchurch Common and part of the Cow Roast.

The overarching character of Northchurch is that of a large village, within a semi-rural area. Most dwellings are set to the south of the Grand Union Canal, elevated from the valley bottom with sloping hills across Green Belt to the north and south. Our houses have a different style to Berkhamsted. In contrast with the tall, Victorian, high-density, London-style

red-brick houses, common in Berkhamsted, the core of 1940s and 1950s dwellings broadly found in the south eastern part of Northchurch create a strong design identity. Here, most buildings have simple brickwork alleviated in part by angled front bays and front tile hanging. A wide-open feel is created by the low density (around 15 dwellings/ha), roadside verge planting and dwellings set back from the road.

In terms of demographics, people of Northchurch are older and less affluent than those of Berkhamsted. Unlike Berkhamsted, a town with many large, impersonal shops, Northchurch has just a handful of small shops and only one pub where customers recognise each other.

The roads in Northchurch are also different from Berkhamsted. In the part of Berkhamsted to the East of the proposed developments, roads running north/south, from the High Street uphill towards Shooters Way are heavily parked and busy with traffic. In contrast, Northchurch Lanes are much quieter. For example, Darrs Lane, which edges the Chiltern Area of Outstanding Natural Beauty, and Bell Lane, which runs between the two Green Belt fields, are narrow with steep grassy banks and hedging. They are country lanes.

The Green Belt fields that lie between Berkhamsted and Northchurch fulfil the primary aim of Green Belt policy: to prevent urban sprawl. They act as a buffer between the town of Berkhamsted and the village of Northchurch. They stop the communities of Berkhamsted and Northchurch from merging into each other. The proposed developments fill these fields with houses which means that Berkhamsted and Northchurch become one. Dacorum have not included the Bulbourne Cross proposal in the Local Plan, despite its advantages, because it would join Berkhamsted to Bourne End. The proposed developments in Northchurch do the same thing: they join Berkhamsted to Northchurch.

So Dacorum's vision fails to preserve the special character and community of Northchurch.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14130
<b>Person ID</b>	1263506
<b>Full Name</b>	Ian Brown
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* <b>Yes</b>	
* <b>No</b>	

## Comment

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14142
<b>Person ID</b>	1163439
<b>Full Name</b>	Lindy Weinreb
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* Yes	
* No	

<b>Comment</b>	<p>All 'vision' statements are inevitably framed with positive language around well-meaning, if platitudinous, sentiments. The 'Overarching Vision for Dacorum's Growth by 2038' is no different with grand statements claiming improvements will be achieved relating to Environmental Sustainability, Economic Growth and Health and Wellbeing. However, much of the plan under consultation works directly against those aspirations, particularly for the two historic market towns of Berkhamsted and Tring and the area between Old Hemel, Piccots End and Potten End.</p> <p>I strongly disagree with 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth is obviously too much for the town. With circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, this equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint (Google Earth used for calculations), most of which is located within sensitive ridge top locations in Green Belt.</p> <p>I note that the 2013 Core Strategy vision of "maintaining the strong valley and linear character of the settlement" has now been emphatically dumped. Where previously the Council asserted that "The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported" (and put this argument strongly to the Planning Inspector), DBC now promote the land for removal from Green Belt and suggests that development can now be built "in a way that takes account of sensitive views and landscape".</p> <p>The plan removes green belt areas that have become and are becoming increasingly popular walking/rambling routes and provide easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes. Over the pandemic residents have not flocked to the likes of Velvet Lawn to do laps of a sports' field, but rather the immediate and wider countryside which is greatly valued b our residents. It's loss will inevitably lead to an increase in mental health problems as evidenced by research. It has been found that green space protects against mood disorders, depression, neurotic behaviour, and stress-related issues.. The effect of green space is also dose-dependent, meaning those who have longer exposures to green space have greater mental health benefits.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14145
<b>Person ID</b>	1163439
<b>Full Name</b>	Lindy Weinreb
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

* No	
<b>Comment</b>	<p>I note the comment in Para 1.28 and 1.29 on page 9 of the draft Plan</p> <p>The subsequent comments serve to alight on the numbers designated [SP2] 16,596 dwellings (viz 922 pa) over the Plan period 2020 – 2038. I remain unconvinced that this number (nor the 1023 pa) should be adopted for the Plan Period given that ONS projections based on 2018 data indicates the annual need is around 350 dwellings pa. Moreover, this contrasts with the current Adopted Plan (Core Strategy 2013 – 2036) that settled on 430 pa.</p> <p>Starting from a premise that is suspect and therefore contentious, the overarching Vision is thus undermined or at least questionable; the prospective high build rate will adversely impact the principal urban centers and especially the unwarranted loss of swathes of Green Belt, including around Berkhamsted/Northchurch/Tring, that are designated in the Draft Local Plan as ‘Growth Areas’.</p> <p>This section relates to proposals set for Berkhamsted and Northchurch [considered in the Draft Local Plan as West Berkhamsted]: over the planned period 2200 dwellings are scheduled [SP2- 3b] of which around 500 are in Northchurch Parish and 1700 in Berkhamsted. This equates to a substantial increase in the number of dwellings in Berkhamsted/Northchurch of around 24% - over the 18-year Plan period and where most of the designated sites are currently in the Green Belt at some distance (3 – 4 km) from the town centre and station at the top of steep valley sides. I cannot see how new housing developments at this distance (and difference in elevation) from main services infrastructure can be considered as “sustainable”.</p> <p>As recognised in Para 23.119 [Page 225] the Town experiences a high level of congestion</p> <p>The following paragraph says: “there are few opportunities for new road capacity in the town”. As a town set in a valley with only one main crossing the county’s engineers comment the traffic lights already operate at over capacity. This results in residents choosing to avoid the main roads in the town centre or travelling to shop elsewhere.</p> <p>The Draft Plan continues (23.121)</p> <p>The last sentence is an aspiration without a foundation to support it: The Plan offers no substantive detail that necessary strategic infrastructure or sustainable transport options, to provide access to the town centre and station, from the proposed development sites, other than by car, have been planned for.</p> <p>The referenced ‘Berkhamsted and Tring Sustainable Transport Strategy’ [Para 23.122] is nothing of the sort, mapping as it does junction enhancements at relatively minor side roads and crossings within the urban area and new/widened footpaths along Shootersway. In the absence of a well-considered Strategic Transport Plan that addresses the critical issues, and its inclusion in the Infrastructure Development Plan, I do not support this Draft Plan to accommodate the Sites designated.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14168
<b>Person ID</b>	1270552

<b>Full Name</b>	Mr Michael Friend
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	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
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14185
<b>Person ID</b>	1253654
<b>Full Name</b>	Jodie Bell
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>The DBC local plan proposes the building of 16,000 new homes during the period of 2020- 2038. that's 922 new houses every year for 18 years and is over one and a half times the current building rate. This would result in the loss of 850</p>

hectares (the equivalent of 1,214 football pitches) of green belt land. The housing numbers in the plan are based on outdated data from 2014. Using more up to date information on housing need from 2018 would half that number. I think that the plan should be revised and the more up to date information should be used.

The Climate Change Emergency needs to be at the core of the Local Plan. The plan states that DBC want to be carbon net zero by 2030 but this is nothing but an ill-defined aim, another of which promotes an unquantified reduction in greenhouse gas (“GHG”) emissions. The plan is inadequate in tackling climate change and environmental issues and should be revised.

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

The plan as proposed fails to take full account of the opportunities to redevelop existing retail and commercial sites and also fails to include the new implications of the COVID-19 pandemic and how this has shaped peoples working lives and need to commute etc. Figures show that there has been a huge increase of people building home offices as they no longer need to travel into work. This is unlikely to change after the pandemic, meaning that office spaces will become less necessary, meaning that the plan needs to be revised.

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than

a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to play a much greater role in delivering housing growth within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14216

**Person ID**

1270581

**Full Name**

MR & MRS DUNCAN

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.</p> <p>I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the</p>

existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14235

**Person ID**

1264711

**Full Name**

Timothy Symington

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

The Plan does not provide a solution to the core problem of affordability of housing locally and therefore fails in its objectives.

It proposes very large numbers of new homes built at low density, principally in locations taken from Green Belt. The plan provides no evidence that these houses will be materially more affordable to local residents than the existing housing stock.

It is much more likely that the new homes will be bought and occupied by people from outside the Borough; or by local people who already own their home. Meanwhile the Plan provides no evidence that the acute local need for more social housing as opposed to so-called "Affordable Housing" will be met.

Strategically the Borough needs housing built at high density on brownfield sites in or around the town centres, a significant proportion of which are social housing. This is also the most sustainable option.

According to the Plan's own calculations 600 houses per annum could be built without needing to develop Green Belt sites (TRL report page 32).

There is no evidence that more than 600 houses per annum is required. The higher quota set by central government is flawed as it is based on outdated 2014 ONS population data. The Council should reject this quota.

In short the Plan proposes the wrong number and type of housing to be built in the wrong places.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14244

**Person ID**

1152075

**Full Name**

Rob Wakely

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

**Climate Change Emergency**

The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.

The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas ("GHG") emissions.

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

In addition to the Enviro-Tech aspirations in the plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

I welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14275

**Person ID**

1270629

<b>Full Name</b>	Rob Bray
<b>Organisation</b>	Head of Sponsorship & Fundraising Tring Rugby Club
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Section (3) Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. The housing figure is too high for Dacorum.</p> <p>Housing need should be based on the most relevant and recent data and not the nonsensical algorithm method and the outdated 2014 ONS data. Without a review of the projected figures the soundness of the local plan is questionable.</p> <p>In addition, the sheer scale of development proposed on open land is at odds with the NPPF, para 11 footnote 6 which allows local authorities to restrict development due to planning consideration such as Green Belt and AONB. 85 % of Dacorum is rural, 60% is Green Belt and 33% is AONB. This should be taken into account!</p> <p>In addition, the strategy fails to take account the combined impacts of the Pandemic and expanded permitted development rights. The local plan process must review in light of this or there is a serious question over the soundness of any local plan that does not address this.</p> <p>The Council’s proposals are neither justifiable or sustainable and therefore I oppose the draft Plan. DBC should revert to the Core Strategy vision statement.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14290
<b>Person ID</b>	1270631
<b>Full Name</b>	SIMON LEGG
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I do not agree with the need to build more houses on developments of this scale within such a small historic market town. The proposals will not assist the affordability of local homes for local people.</p> <p>We need a sensible policy that does not overpopulate our few remaining green spaces.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14300
<b>Person ID</b>	1259141
<b>Full Name</b>	Kirsten Riemer
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p>

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by

way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should

be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS14311

**Person ID** 1270635

**Full Name** Catherine Bright

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Comment**

I moved to Tring because the size and character of the town appealed to me. Your local plan proposal will change the market town character of Tring by such a massive increase in the number of houses, people and cars. The historic town is constrained in terms of the ability to widen the main through roads, therefore, the proposed local plan increase will lead to congestion and possibly gridlock in the High Street and other main junctions in the town at the ends of Brook Street, London Road, Station Road, Cow Lane, Grove Road, Icknield Way and Wingrave Road.

Hemel Hempstead's housing growth is delivered with a 34% provision of Green Belt allocated land, whereas in Tring the allocation requires 81% Green Belt land allocation. This cannot be right!!

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS14318

**Person ID** 1270637

**Full Name** TOM GROVES

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

**Comment** No. Too many houses proposed.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS14343

**Person ID** 1270640

**Full Name** Geoffrey Llewellyn

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>Specifically, I do not agree with ‘The Vision for Dacorum’s Places’ relating to Berkhamsted or Tring. The proposed growth is simply too much for the towns – with circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, it equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint, most of which is located in Green Belt. I am concerned that the 2013 Core Strategy vision of “maintaining the strong valley and linear character of the settlement” has been dropped from the new Local Plan. Where previously the Council asserted that “The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported” (and put this argument strongly to the Planning Inspector), DBC now promotes the land for removal from Green Belt and suggests that development can now be built “in a way that takes account of sensitive views and landscape”. I strongly disagree with this premise and believe the 2013 vision should be re-instated.</p> <p>I note and agree with BRAG’s analysis of the Government’s clear support for the protection of the Green Belt. This set of policies is completely contravened by DCB’s statements. The Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, therefore I do not understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified” that the number of houses proposed is not sustainable. Indeed, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the new retrofit Borough Vision fails to reflect any of this.</p> <p>Why cannot Dacorum stand up for what is in the best interests of the residents of the Borough and their quality of life?</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14350
<b>Person ID</b>	1270641
<b>Full Name</b>	WILLIAM ALLEN
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>The Dacorum Local Plan for the next 18 years fails 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. 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. The Local Plan does not provide evidence that demonstrates that the houses that will be delivered will meet this need. Furthermore, the most recent ONS statistics on housing need in Dacorum shows we need to build 355 houses a year over the period of the plan. The target of 922 houses included in the Local Plan is not, therefore, supported by the available evidence, especially when Brexit and Covid have reduced housing demand.</p> <p>Simply building more and more homes in Dacorum will not provide any noticeable depressive effect on house prices in the area, it will rather attract more people from London to buy here. This does nothing to reduce the numbers on our housing list, and very little to address the specific housing needs of Dacorum.</p> <p>This consultation, even when extended, has failed in the intended outcome of engaging with as many of the population as possible. An on-line process excludes large numbers of residents. A widely inconsistent distribution of the leaflet has missed large elements of the community.</p> <p>Availability of paper copies in libraries has been flawed and inconsistent with lockdown messages, especially for residents in high risk categories encouraged to self-isolate. This process was almost entirely run during lockdown at a time when Covid has been an enormous distraction for large elements of the community and as a result, too few residents have known this process was underway. Conducting a consultation over Christmas has not helped. Even in the final days of the consultation people were asking for leaflets from elected members and strategic services. The process has, therefore, been deeply flawed.</p> <p>In addition, much of the work done on the local plan was carried out before COVID-19 and the consideration of changes in lifestyle as a result of the pandemic and arising from it have not been included in arriving at this plan for how Dacorum will grow and change over the next 18 years. This is a major flaw in the plan, and it is vital that this is rectified.</p> <p>The Emerging Local Plan provides for too many houses overall, and insufficient social housing. The number of houses calculated by the Standard method, has changed during the course of the consultation, meaning that the local plan is based on out-of-date figures.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS14393
<b>Person ID</b>	869011
<b>Full Name</b>	Mr John Savage
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14401
<b>Person ID</b>	1270653
<b>Full Name</b>	NEIL BRANCH
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>To the data used to estimate the boroughs housing needs is out of date and consequently the predicted level of additional housing requirement is too high.</p> <p>I believe a much more concise plan to protect the local natural habitats should be laid out.</p> <p>The proposals for employment and infrastructure growth are insufficient for the proposed levels of growth for the town.</p>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14411
<b>Person ID</b>	1270654
<b>Full Name</b>	RICHARD WALL
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>With respect to Berkhamsted, this is a large development for a town whose geography does not permit expansion on this scale, being largely based on two sides of a steep valley. Whilst recognising that the government has increased pressure on councils to deliver housing, councils are nevertheless permitted to consider environmental factors such as Berkhamsted's location in the Chiltern AONB.</p> <p>The strategy expresses imprecise aims around the provision of supporting infrastructure provision, and offers little confidence in how the constraints on existing infrastructure will be alleviated in time to support the new housing, such as schooling and roads.</p> <p>Berkhamsted's valley location places particular challenges on the potential provision of sustainable transport provision including "improvements in walking and cycling connections". The gradient of the hillside already causes high volume of motor traffic to and from the town centre, and without a clearer plan the aspiration to achieve such "improvements" has limited credibility.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14413
<b>Person ID</b>	1270662
<b>Full Name</b>	MAX GOODE
<b>Organisation</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	LCR and NR support the overarching vision for Dacorum, its places and the Strategic objectives for the Borough and considers that the draft allocation at Hemel Hempstead Station Gateway can help to achieve these.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14434
<b>Person ID</b>	1270665
<b>Full Name</b>	Cllr Stephen Claughton
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>The draft Plan provides for too many houses overall, while at the same time producing insufficient social housing. It is unclear why out-of-date (2014) ONS figures are being used by Government to set targets for new homes rather than the ONS's more recent assessment of household growth, based on 2018 figures. The prospective high rate of build will lead to an unjustified loss of Green Belt. It will also cause gridlock in Berkhamsted Town Centre, which prior to the pandemic was already reaching saturation point at peak times. The "Berkhamsted and Tring Sustainable Transport Strategy" fails to address this issue.</p> <p>Dacorum has an acute shortage of social housing with over 7,000 people on the housing list. Although the Council has a laudable building programme of its own, it is too modest and has failed to keep up with increasing need. Allowing private developers to build more executive homes in Dacorum will do nothing to reduce the numbers on the housing list, but simply encourage more people to move out of London. Nor will it achieve the Government's stated objective of reducing house prices, since developers will control the number of homes they release in order to maintain prices.</p>

The Local Plan was mostly developed before Covid-19 and does not take account of changes in lifestyle and working patterns that are likely to emerge after the pandemic. In view of this, the Council should adopt a precautionary approach, avoiding any re-designation of the Green Belt, until the Plan can be revised in the light of the pandemic.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14470

**Person ID**

1270672

**Full Name**

ICP Asset Management Ltd

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

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.

The Plan is not justified, as it is not the most appropriate strategy based upon the evidence base.

These representations request that the Council undertake the following:

- 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;
- Recognise the important economic role that care homes provide.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS14475
<b>Person ID</b>	1270672
<b>Full Name</b>	ICP Asset Management Ltd
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>ICPAM considers that the overarching vision and strategic objectives are not right for the Borough, for the following reasons.</p> <p>Firstly, in considering Housing Growth (paras 2.3-2.5) the Vision is silent on meeting the housing needs of an ageing population. The 2016 Strategic Housing Market Assessment (the 'SHMA') forms a key part of the Local Plan's evidence base.</p> <p>The SHMA identifies a demand for different types of specialist housing for older people and care provision, and projects that by 2036, the Borough's population aged 75+ will have increased by 9,711 people (Table 58, p.147).</p> <p>The South West Herts Local Housing Needs Assessment (the 'LHNA') is a more recent document. Table 80 of the LHNA shows that between 2020 and 2036 there will be 45% increase in the over 65 population, a significant increase.</p> <p>Table 78 of the SHMA identifies an annual need of 72 homes per year between 2013-2036 in order to meet the needs of specialist housing for older persons and a further 30 homes a year for residential/nursing care bedspaces.</p> <p>The equivalent figures in the LHMA are contained in Table 90 which identifies an Older Person's Dwelling requirement between 2020 to 2036 of some 1,340 homes, and a significant increase in care bed requirement to 1,019 bedspaces.</p> <p>This total equates to far more than 10% of the overall housing need figure of 922 dwellings per year (Local Plan para 1.37), albeit is not contained within the 922 dwelling figure. There is therefore a significant need for older person and care accommodation which must be reflected in the Strategic Objectives and Vision for Dacorum.</p> <p>ICPAM do, however, support the strategy in para 2.24 of optimising the use of previously developed land as far as possible. Unfortunately, for reasons set out later in these representations, they consider that the Council has not gone far enough in doing so by failing to allocate development of previously developed land on land at Spring Gardens Lane, which is free from technical constraints.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038

<b>Comment ID</b>	EGS14477
<b>Person ID</b>	1270672
<b>Full Name</b>	ICP Asset Management Ltd
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	ICPAM support the recognition at para 2.9 of providing space for small and medium enterprises. It is important that the Local Plan recognises the key contribution that other non B and E class employment generating uses (such as C2) provide in assisting in meeting employment needs for both skilled and unskilled workers. The Vision must also, therefore, be amended to include reference to this.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14478
<b>Person ID</b>	1270672
<b>Full Name</b>	ICP Asset Management Ltd
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	The Vision for Dacorum's places, and in particular Berkhamsted (Local Plan p.23), should be amended to include a further bullet point stating:  <i>"to have delivered well designed care accommodation and homes for older persons where they can remain part of the local community."</i>

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14500
<b>Person ID</b>	1270685
<b>Full Name</b>	Ms Jan Kerry
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS14510
<b>Person ID</b>	1270383
<b>Full Name</b>	Mr Nigel Kerry
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p>

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14520

**Person ID**

1270690

**Full Name**

Akzo Nobel CIF Nominees Ltd

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>Question 1: Do you think the overarching vision, the vision for Dacorum's places and the strategic objectives are right for the Borough?</p> <p>Our client supports the overall strategic objectives of the Council's Regulation 18 Draft Local Plan and in particular the focus on the delivery of new homes, including affordable homes and those for disabled and older people.</p> <p>Our client supports the Council's vision for Berkhamsted as an inclusive market town and specifically the need to deliver a mix of market and affordable housing and new community facilities. Our client further emphasises that this is a suitable and sustainable location for growth. The vision for Berkhamsted should however go further to ensure new growth continues to make it "an attractive and inclusive market town with regard to its heritage, sensitive views and landscape character".</p> <p>In respect to the Council's Strategic Objectives, our client broadly supports these, but make a series of specific comments. In respect to housing delivery, our client welcomes the Council's aim to deliver the identified housing requirement within the Plan period 2020-2038 and crucially, to deliver more truly affordable homes and homes for older people (includes retirement living). That said, it is evident that DBC needs to identify additional suitable sites for housing in its urban areas if it is to satisfy its Objectively Assessed Need (OAN) and meet its housing target for the Plan period.</p> <p>The Council's OAN of 922 dwellings per annum (dpa) (more than double the current target of 430 dpa) will need to reflect the Government's new Standard Method (December 2020) and minimum requirement for 1,023 dpa (increase of 101 dpa) in interests of ensuring the new Local Plan is positively prepared and as a minimum, seeks to meet the area's OAN in accordance with the paragraph 35 of the NPPF.</p>

In respect to the economy, our client supports the Council's strategic objective of encouraging inward investment, maintaining commercial enterprise and employment opportunities in the market towns such as Berkhamsted and ensuring town centres continue to evolve and flourish.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14536

**Person ID**

1163978

**Full Name**

John Wignall

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was

shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has " delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. " This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

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The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14563
<b>Person ID</b>	1270700
<b>Full Name</b>	Mr Peter Sims
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>There are a number of issues with the current vision and strategic Objectives.</p> <ul style="list-style-type: none"> <li>• Prioritisation of Objectives</li> </ul> <p>Long terms needs to be prioritised before the short term. Enviromental Limits, particularly avoiding biodiversity collapse locally and reaching zero carbon by 2030 (as council has committed to do) need to be prioritied over all other objective. There no point having lots of shiny new homes if we don't have a stable enviroment to living them and food to eat in them. This links onto the next most important objectives, which is ensuring basic needs are meet. Dacorum is current almost totally relaite on the rest of the UK and imports from abroad to meet it's food and clothing needs. Whilst it would be silly to expect it to be self sufficient, in the face of uncertain future climate change creates (even if you we get to Zero carbon by 2030) there is a level of resilience in basic needs which is desirable. Then, and only then are 'nice to have'. Yes we should try and improve our society, built enviroment and local enviroments, and part of that is about the economy and oppurtunitys. But this has to be secondary to enviromental limits and meeting basic needs/resiliance.</p> <ul style="list-style-type: none"> <li>• The objectives themselves</li> </ul> <p>Given that dacorum is not an island with fixed population, the idea of "delivering homes for everyone" is rediculas. Who is everyone? Does that include all the refugee in the world looking for a home? Equally "Generating a vibrant economy with oppourtunities for all". Who is the all? current inhavitants? Any who fancy living here? This are poorly defined and ill concerved objectives. We don't need to "generate a vibrant" economy, we need to maintain and improve the one we've already got. We certainly should asipre to maximise the size of Dacorum's economy, as that would suggest that eventually we want Dacorum to become a mega city in it's own right! For objectives to be useful they need to be sperific. Say</p>

“mitigating and adapting to climate change” is vague and unhelpful. A better objective would be “Ensuring Dacorum limit's its consumption and production GHG emission in line with limiting climate change to 1.5 degrees”.

- Dacorum has been failed (like most of the county) by a national government that has failed to have a equitable approach to regional inequality. The countries vision should be an equitable distrobution of jobs, opputunity, housing and wealth regionally, and that means investing where there is a deficit. If some parts of the UK are lacking in employment oppurtunity's, but have surplus housing, then prehap investment to create jobs should be directed Is some parts of the country have some many jobs and oppurunitys that there isn't enough housing, prehaps that's a reason to avoid create jobs (and there for 'growth') in those areas.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS14577

**Person ID** 1270702

**Full Name** TESCO PENSION INVESTMENT FUND MANAG

**Organisation** C/O Savills

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment** Tesco Pension Investment Fund Management support the overarching vision for Dacorum.

The Local Plan should seek to facilitate the optimisation of previously developed land and increase in heights and densities. Mixed use development (residential and commercial uses) should be supported on sustainable sites and intensification promoted having regard to appropriate local context.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS14581

**Person ID** 1270702

<b>Full Name</b>	TESCO PENSION INVESTMENT FUND MANAG
<b>Organisation</b>	C/O Savills
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p>TPIFM supports the overarching vision and strategic objectives for Dacorum as outlined within the Local Plan consultation document.</p> <p>The Local Plan should seek to facilitate the optimisation of previously developed land and this will include an increase in heights and densities. Mixed use development (residential and commercial uses) should be supported on sustainable sites and intensification promoted having regard to appropriate local context.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14597
<b>Person ID</b>	1270709
<b>Full Name</b>	Mr Rodney Tucker
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	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 high levels of air pollution and the continuing lack of clean drinking water in this area have not been considered with increased breathing related illness, asthma etc, this area needs conservation not concrete.

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**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14604

**Person ID**

1270714

**Full Name**

Mr Kevin Kelly

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**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, Berkhams 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 a outdated ONS projections. The latest ONS data available projects 6051 new homes in

Dacorum by 2038 – 64% fewer than this plan projects - and falli 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 pr water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs (to name but a few crucial infrastru requirements) and the detrimental impacts on our wildlife and countryside that will extend far beyond just the green belt land being concreted over.

The high levels of air pollution and the continuing lack of clean drinking water in this area have not been considered with increased breathing related illn etc, this area needs conservation not concrete.

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

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14611

**Person ID**

1270715

**Full Name**

Sunil Tandon

**Organisation**

The Park Garage Group PLC

**Agent ID**

1264313

**Agent Full Name**

James  
Hodgkins

**Agent Organisation**

Simply Planning Ltd

**Yes / No**

Yes

\* Yes

\* No

**Comment**

Yes, however, we acknowledge that there is an identified need for electric vehicle charging infrastructure and affordable homes that we do not believe has been fully addressed.

This consultation response, therefore, respectfully requests that the site known as Kings Langley Service Station and Adjoining Land, 124-127 Hempstead Road, Kings Langley, Bedfordshire, WD4 8AL be consider for inclusion within the plan as a mixed-use commercial/residential allocation.

In particular, it is our client's intention to deliver an electric vehicle charging facility (sui generis) together with an ancillary roadside retail/café unit (Use Class E), and affordable residential development, providing 20 – 30no. units.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14625

**Person ID**

1270729

**Full Name**

MR & MRS A HOUGHTON

**Organisation**

**Agent ID**

1270728

**Agent Full Name**

MS  
KAREN  
GALLEY

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I am unclear about the need driving a target growth in Dacorum of 16,595.

Each settlement in Dacorum uniquely contributes to the success of the Borough.

- Hemel Hempstead, the hub of employment with its sizable Business Park (one the largest in east England). The projected growth of Hemel Hempstead appears justified by its global business stature, existing infrastructure, proximity to communication channels, and road networks that make it better equipped to accommodate growth - without encroachment on Green Belt.

- Berkhamstead, Tring, Bovingdon, Kings Langley and Markyate supporting local business and enterprise, have totally different characteristics and offerings to the borough. Tring being the most obviously rural abutting Greenbelt land and the Chiltern area of outstanding natural beauty. It is not clear why there is not a more proportionate allocation of growth across all other communities.

The proposal to grow Tring 55% to meet the 'target' growth is disproportionate and will completely alter the nature of the community and the rural landscape, particularly with the allocation of significant areas of greenbelt to accomplish this. I remain doubtful why Tring is required to "play a much greater role in the delivering housing growth" within the borough, when it already fulfils a needed role attracting tourism, providing historical interest, and access to recreational space for cycling and walking for many in Dacorum.

A comprehensively planned new neighbourhood to the east of Tring with associated infrastructure new schools etc is still likely to impact on the environment through: increased traffic and congestion in Tring's centre, (because people will always choose to drive to central facilities rather than walk); the ecology of the surrounding natural landscape, detriment to open space and views and natural beauty.

I think there are emerging factors to consider given the onset of the pandemic in 2020. The changing nature of business requirements, and retail needs of the population. As the Emerging Strategy for Growth 2.26 (onwards) notes, this is an unknown and may impact the focus of Dacorum's Strategy in stabilizing the existing infrastructures and enhancing these. There is an increase in working from home, and a desire for people to want homes with bigger gardens, and access to green spaces for improved health.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14634

**Person ID**

1270731

**Full Name**

MRS JOAN EELEY

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovington, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14644

**Person ID**

1265051

**Full Name**

Edmund Knox

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14661

**Person ID**

860814

**Full Name**

Mrs Clare Joyce

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Section 3.3: Dacorum has declared a climate emergency so your over-arching theme should be the preservation and minimal impact to the natural environment.

Overarching Vision for Dacorum's Growth by 2038: This is all rather vague with no real vision and few solid aspirations e.g. "high standard of design" - what does that mean? Excellent architecture? Carbon neutral build? "Enhance the AONB" How exactly?

The Vision for Dacarum's Places - Tring & Berkhamsted

In the Vision for these two towns, you would be hard-pressed to see Tring and Berkhamsted as different market towns with distinct identities and yet anyone who knows them will tell you they are very different. For example: Berkhamsted has far more of the retail experience than Tring with a number of high end luxury shops, whereas Tring has smaller, independent shops but does not offer the full shopping experience (and neither should it). Tring is far more popular with

visitors during the summer months than Berkhamsted. Any vision (as described below for Tring) should enhance the unique identities of the town. This plan, as in subsequent plans, has failed to do so.

#### The Vision for Dacorum's Places - Tring

Once again this is all rather vague, with few aspirations for a town in the 21st century and fails to address the reasons why people live, work and visit Tring. It also strikes me as woefully outdated with the same vague meaningless aspirations that I've seen through numerous consultations. People live here for it's semi-rural location, it's "small town" feel, it's easy access to amenities and the countryside by walking / cycling. People visit Tring to admire the Rothschild architecture, visit the museums, Tring Park and the nearby canal and reservoirs and to browse independent shops and enjoy excellent cafes and restaurants. A vision would look at how we can enhance the positive outcomes residents and visitors feel they get from these unique aspects of Tring and what we want a small town to offer in the future - is a "business hub" really going to be needed in the mid 21st century?

A planned new neighbourhood and the required infrastructure to support it in itself is NOT an aspiration unless it brings benefit to local people (meets local demand for housing and maintains Tring's social and natural history) or to the environment / wildlife (increasing biodiversity, wildlife corridors etc.). This Plan has failed to demonstrate either of these: with a substantial loss of Green Belt, environmental sites and sensitive views and a 55% increase in housing that is far in excess of the expected population growth.

Delivery of "open space" and "leisure facilities" is at the expense of open countryside that acts as a "buffer" to the AONB. This does not mitigate the loss of Green Belt land (which I believe is a requirement?) and therefore cannot form part of a vision for Tring.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14678
<b>Person ID</b>	1270739
<b>Full Name</b>	HELEN OSBORNE
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemet Hempstead- a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to " play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) In housing In Tring. As a result of this Council growth propoal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements I e. 23% growth In Hemet Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness or the Green Belt and the Area or Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has " delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant Intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its Introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built</p>

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14688

**Person ID**

1270740

**Full Name**

JOHN OSBORNE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

## Comment

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14698

**Person ID**

1270752

**Full Name**

DOUGLAS CANNON

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14710

**Person ID**

1270753

**Full Name**

ANNE PIKE

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14741

**Person ID**

1270760

**Full Name**

LQ Estates

**Organisation**

LQ Estates

**Agent ID**

1270759

**Agent Full Name**

Miss  
Hanna  
Mawson

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

3.0 The Overarching Vision for Dacorum is generally supported and the references to delivery of balanced communities with the homes, jobs and supporting infrastructure is welcomed. The reference to the provision of new housing in sustainable locations and to a high standard of design is also generally reflective of national policy.

3.1 The Vision is then applied to separate places to provide a more tailored approach to various settlements. This approach is supported and assists in delivering the Vision through the plan. Tring is identified to grow to be an inclusive market town that meets the needs and aspirations of existing and new residents. In particular, the planned new neighbourhood to the east of the town is identified for delivery which is supported. The Vision states that Hemel Hempstead

will grow significantly whereas other settlements, including Berkhamstead and Tring, are identified to 'grow'. It is suggested that all settlements should be identified to 'grow' as the higher level of growth for Hemel Hempstead is proportionate to its size and status in the settlement hierarchy.

3.2 The Vision is supported by objectives, split into various topic areas. Under delivering Dacorum's Future with Homes for Everyone the first objective is "to deliver the identified housing requirements between 2020 and 2038". This is generally supported however it would be helpful to confirm the identified housing requirement as per the Standard Method figure of 1,023 homes per annum.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14783
<b>Person ID</b>	1142710
<b>Full Name</b>	Mr Chris Stoneman
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan – 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 . I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead – a 23% growth (10,600 houses) in housing. It is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period – only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough a 55% growth (2,700 houses) in housing in Tring. As a result of the Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was</p>

shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites”. This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of the town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonable within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14794

**Person ID**

1270798

**Full Name**

SAYED BEL-BAROO

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.</p>

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14811

**Person ID**

1270802

**Full Name**

Mr Edward Blogg

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Please see my answers below

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14820

**Person ID**

1270804

<b>Full Name</b>	Dr Jessica Field
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to play a much greater role in delivering housing growth within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that significantly impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14834

**Person ID**

325470

**Full Name**

Gardener Family Trust

**Organisation**

Gardener Family Trust

**Agent ID**

1270807

<b>Agent Full Name</b>	Mr Alistair Brodie
<b>Agent Organisation</b>	Henry H Bletsoe & Son LLP
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>The ambition of this section of the Emerging Local Plan sets out the planning authority's intention to meet the level of growth required for Dacorum. Subject to our later comments, concerning the need for a diverse choice of sites for the provision of new homes, we support this section of the plan.</p> <p>We acknowledge, at paragraph 2.1 first bullet point, the need to manage a step change in housing provision supported by the necessary infrastructure. We are concerned about the allocation of large sites which will inevitably involve long lead in times, prior to the delivery of housing. We note that the plan seeks to provide new housing in sustainable locations, to a high standard of design. The site identified later in this representation provides an ideal opportunity for a free standing scheme incorporating high quality design principles, whilst maintaining the identity and separation between settlements.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14861
<b>Person ID</b>	1265016
<b>Full Name</b>	Charles Aylwin
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	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 Cemetry with no additional infrastructure (schools, doctors, dentists, childcare/nurseries, drainage) planned. In this sepific instance, the housing is being built, but none of the amenities above have had additional capacity added.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14873

**Person ID**

1270825

**Full Name**

Mr Richard Hardy

**Organisation**

Managing Director  
Lansdown

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

(no comment)

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14876

**Person ID**

1144629

**Full Name**

Mrs SOPHIE LAWRANCE

**Organisation**

**Agent ID**

**Agent Full Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>Dacorum is currently blessed with significant areas of Green Belt countryside, and market towns rich in history. Those towns and countryside offer significant amenities and benefits to residents. However, it is also an area which lacks significant infrastructure. There is no large hospital within the borough; the train service into London is already at capacity,<sup>1</sup> there are existing air pollution concerns<sup>2</sup>, schools are full<sup>3</sup>, and roads are increasingly clogged.<sup>4</sup></p> <p>The Plan put forward by DBC ('Emerging Strategy for Growth, 2020-2038') threatens to harm the borough irreversibly. Destruction of swathes of Green Belt land, with inevitable adverse impacts on the neighbouring Areas of Outstanding Natural Beauty (<b>AONBs</b>), coupled with the increased pressure on towns and villages built for much smaller populations, and a lack of investment in infrastructure will result in a lowering of living standards, a reduction in biodiversity, an increase in car use and consequently an acceleration of climate change - contrary to the council's own declaration of a climate change emergency. While the council relies on housing growth figures put forward by government, this does not absolve it of its other responsibilities under the National Planning Policy Framework, notably to protect the Green Belt, Areas of Outstanding Natural Beauty and to adopt policies consistent with the climate emergency.</p> <p>While the Plan itself recognises the need to reduce reliance on car travel, reducing congestion and poor air quality,<sup>5</sup> many of the proposed developments will exacerbate, rather than solving the existing problems. Rather than providing affordable housing in locations close to local infrastructure - they are focussed on providing dormitory style accommodation at a distance from town centres resulting in an inevitable continued reliance on car journeys (this is the case in particular with the developments around Northchurch/South West Berkhamsted). This is contrary to requirements of the NPPF that planning should: "<i>support the transition to a low carbon future in a changing climate</i>" and to "<i>shape places in ways that contribute to radical reductions in greenhouse gas emissions</i>" (NPPF, paragraph 148).</p> <p>The scale of the planned development in the market town of Berkhamsted and the village of Northchurch (whose separate identity is not acknowledged in the Plan), and to an even greater degree, in Tring is out of all proportion to the existing size of these historic places, which have insufficient infrastructure to cope with the planned increases in housing.</p> <p>While the housing need may have been calculated in accordance with an formula foisted on boroughs such as Dacorum by central government, it is incumbent on the council to assess its obligations in the light of the other fundamental requirements of the National Planning Policy Framework (<b>NPPF</b>), including notably the need to protect AONBs (which is not met by placing large housing estates in ridge-top locations visible from the AONB itself - e.g. as is proposed in 'Growth Area Bk06') and the obligation to remove Green Belt protection only in exceptional circumstances. These NPPF</p>

requirements are not subservient to the assessed housing need, but the reverse: where housing need can't be met without violating NPPF principles, it is acceptable for the need not to be met or to be met only in part.<sup>6</sup>

The Council needs to rethink its plans in the light of the changes wrought by the pandemic on (among other things) working and shopping patterns as more shopping moves online. It is clear that significant policy change at a central level is coming: for example, reforms to changes of permitted use are planned to facilitate permitted development of empty retail premises into residential properties in and near town centres. This should free up significant high street and urban accommodation, which can be used in preference to greenfield and (in particular) Green Belt sites. Dacorum itself already has experience of successfully blending significant housing (social and mixed low value private) into a town centre, as in Hemel Hempstead. This approach is also consistent with the need to ensure that housing is located near to facilities and transport centres, rather than comprising new dormitory dwellings on the outskirts, which (realistically) can be reached only by car (particularly the case with the developments in Northchurch / South West Berkhamsted, such as Bk06 and Bk08).

Despite proposing changes to the borough which will have a profound influence on residents and on future generations, the consultation has been pushed through at a time when the country has been under national lockdown, resulting in an entirely inadequate consultation process and a failure to adapt to the new, realistic planning needs of the county as we emerge from the pandemic.

A new approach is needed to avoid untold damage being not needlessly done to our countryside, to the detriment of the environment, current residents and future generations.

1 Appendices to Interim Sustainability Appraisal Report, p.76 - see [https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-interim-sustainability-appraisal-report-appendices---november-2020.pdf?sfvrsn=6abe0c9e\\_4](https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-interim-sustainability-appraisal-report-appendices---november-2020.pdf?sfvrsn=6abe0c9e_4)

2 Dacorum Emerging Strategy for Growth, paragraph 2.13, p.15. Appendices to Interim Sustainability Appraisal Report, p.22.

3 Appendices to the Interim Sustainability Appraisal Report, p.22.

4 Interim Sustainability Appraisal Report, p.20.

5 Dacorum Emerging Strategy for Growth, paragraphs 2.13-2.16, pp.15-16.

6 National Planning Policy Framework, paragraph 11.

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14905
<b>Person ID</b>	1270828
<b>Full Name</b>	Owen Ellander
<b>Organisation</b>	Head of Property Development Greene King Brewing and Retailing Ltd
<b>Agent ID</b>	1270829
<b>Agent Full Name</b>	Mrs Helen Binns
<b>Agent Organisation</b>	Walsingham Planning
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14914
<b>Person ID</b>	1270836
<b>Full Name</b>	Tully Children's Fund
<b>Organisation</b>	Tully Children's Fund
<b>Agent ID</b>	1270837
<b>Agent Full Name</b>	Sav Patel
<b>Agent Organisation</b>	Associate Director Strutt & Parker
<b>Yes / No</b> * Yes * No	

<b>Comment</b>	<p>The emerging local plan identifies the vision for development in Dacorum between 2020 to 2038. The Emerging Strategy for Growth (ESG) seeks to deliver the planned future growth and demands for the Borough through the well-established principles of sustainable development which focus on the economic, social, and environmental objectives in the NPPF. Section 5.2 of the ESG identifies several key principle considerations to support the delivery of growth, such as:</p> <ul style="list-style-type: none"> <li>• Delivering our requirement to significantly boost the housing supply, and in particular, increasing the number of new and genuinely affordable homes in the Borough;</li> <li>• Seeking out opportunities to maximise the amount of development on previously developed land within existing urban areas but taking this concept much further in Hemel Hempstead by proactively encouraging substantial increases in heights and densities in the most accessible locations;</li> <li>• Providing growth that will contribute to the transformation and regeneration of Hemel Hempstead and renewal of its New Town infrastructure;</li> <li>• Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations;</li> <li>• Providing growth in the villages that reflects their role and character;</li> <li>• Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites; and</li> <li>• Ensuring that the preferred strategy is of such a form and scale to deliver the appropriate level and type of infrastructure such as schools, health and transport/movement.</li> </ul> <p>These proposed principles as set out above are broadly However, we suggest that housing growth should be more dispersed and that the proposed housing allocations within the Local Plan, particularly policies HH01 and HH02, do not follow the ESG as identified within the Vision section of the Local Plan.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14929
<b>Person ID</b>	1270839
<b>Full Name</b>	EMMA WELLER
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

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Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

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I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

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**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS14940

**Person ID**

1270499

**Full Name**

Hertfordshire County Council Property

**Organisation**

Property Team

**Agent ID**

1263792

**Agent Full Name**

Ms  
Claire  
Newbury

**Agent Organisation**

Senior Associate  
Vincent and Gorbing

**Yes / No**

* Yes	
* No	
<b>Comment</b>	<p><b>VISION AND STRATEGIC OBJECTIVES</b></p> <p>Overall, HCC supports the Vision and Objective of the ESG. HCC particularly welcomes the acknowledgement that Tring is a sustainable settlement within the Borough that is capable of, and should support, a substantial proportion of development to meet the significant increase in housing need across Dacorum.</p> <p>HCC supports the statement within The Overarching Vision for Dacorum's Growth, that new housing should be provided in sustainable locations to a high standard of It has been demonstrated that Tring performs as well as Berkhamsted in terms of settlement characteristics and services and can therefore support the level of growth being proposed within the Local Plan. HCC therefore supports the growth aspirations for Tring and the important contribution that Dunsley Farm site allocation (Tr01) will make towards this vision, particularly in terms of delivering key infrastructure facilities to support the overall growth.</p> <p>HCC notes the Council's comments that the significant long term growth within the Borough will need to be supported by major investment in infrastructure, and that new development must contribute to its full share of the new infrastructure required to deliver HCC are including land at the Dunsley Farm site to provide a replacement fire station and a new primary school. In accommodating this crucial infrastructure at the Dunsley Farm site, HCC would expect the Borough Council to ensure that appropriate levels of contributions are sought from the other strategic development sites within Tring to fund these services, which will serve all of the new development across the town.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS14966
<b>Person ID</b>	1207224
<b>Full Name</b>	Chris Padley
<b>Organisation</b>	Environment Agency
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Comment</b>	We are pleased to see that Dacorum acknowledges the challenges the borough faces due to climate change including flooding. Drinking water availability will also be affected. Any Climate Change Strategy should fully consider becoming

resilient to the effects of climate change while planning for the future and not solely concentrate efforts to reduce carbon emissions. One of the most proactive approaches to this would be to steer all development away from flood zones.

There are a number of flood risk assets within Dacorum that may need replacing or maintenance within the plan period which may not be acknowledged in your Infrastructure Delivery Plan (IDP). We tried to engage with the consultants working on your IDP but were unable to provide comment.

We would like to see your rivers and globally rare chalk streams included within your sensitive environments to fully embed their importance and their need for protection.

We are supportive of paragraph 2.20, development should be required to improve the environment and biodiversity.

Overall we are supportive of the vision but believe important aspects have been overlooked. Water quality of rivers has been included which is good to see however Chalk streams and river corridors should be included as special features like the Grand Union Canal has been. The vision mentions that the countryside is actively managed but there is no mention of whether the urban green spaces are actively managed. This includes an appreciation for the natural capital provided by the environment.

Again the only reference to climate change is Dacorum's 'contribution to climate change', presumably in relation to carbon. This will need to be expanded to be clear that **Dacorum will also need to be resilient to the effects of climate change through development, not just mitigate its causes**. This needs to be fully imbedded throughout the local plan.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15002

**Person ID**

869019

**Full Name**

Mrs Shelley Savage

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p><b>2.3 Housing Growth:</b> The government has recently altered its strategy, so perhaps Dacorum will not need to fulfil its 'quota' after all. I look forward to hearing more about the new plans.</p> <p>The number of dwellings proposed for Tring is monstrous. The reasons for it are not justified in this document, and if carried out, would be a disaster for the town.</p> <p><i>Delivering Dacorum's future with homes for everyone:</i> This should not just mean little houses with gardens in rural areas. The latter are environmentally unsustainable in large numbers. 'Homes for everyone' should also mean flats and high-rise developments which are more sustainable, do not despoil Green Belt areas and ensure vibrancy of towns and cities.</p> <p>I applaud the high priority given, in theory, but by proposing to build houses and roads over large areas of land on Green Belt, the vision is deeply flawed. Roads mean cars, and until everyone has electric or other sustainable vehicles, petrol and diesel emissions will contradict the climate emergency strategy. As will the disappearance of fresh air, fields and trees.</p> <p>2.11 Our high streets are going to be reshaped by a number of factors including continuing changes to retailing patterns brought on by the growth. What is missing here are other possibilities for enhancing town centres, including High Streets, by any kind of art, craft or cultural enterprises. These would also be reasons for visiting the centres, on a regular basis, for people of all ages, and at different times of the day. I urge further consideration for this aspect of development .</p>

...—

Tring - cannot "quickly and easily be reached by sustainable public transport". Tring Station carpark is normally full with nowhere else to park . The buses can only go as fast as congested High Streets allow, i.e. neither quickly nor always easily, especially when travelling to the Station

"Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and help balance growth and development opportunities in the Borough". The words '*balance growth and development opportunities*' do not take into account that Berkhamsted and Tring are defined as "small market towns". That is their character and definition, so should not be just places to theoretically balance growth, because they will lose the essence of their existence.

In addition, because their roads are appropriate to small market towns, they are NOT amenable to growth and development on the scale envisioned in this document.

*2.4 In addition, the Borough's high average house prices means that buying market housings increasingly difficult for many households. The dream of owning a home etc... see earlier comment:*

*Delivering Dacorum's future with homes for everyone:* This should not just mean little houses with gardens in rural areas. The latter are environmentally unsustainable in large numbers. 'Homes for everyone' should also mean flats and high-rise developments which are more sustainable, do not despoil Green Belt areas and ensure vibrancy of towns and cities.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15010
<b>Person ID</b>	1270845
<b>Full Name</b>	DOMINIC LAWRANCE
<b>Organisation</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p><b>Although some aspects of the plan are laudable, the wholesale and irreversible destruction of countryside contemplated by the plan is shocking.</b></p> <p>It is noted that the plan would, if implemented, involve the sacrifice of 18 distinct sites within the borough that are within the Green Belt. Some 850 hectares of Green Belt land, other countryside and urban green space within Hertfordshire will be lost forever. The scale of the destruction, in a borough which is renowned for the quality and importance of its landscape, is frankly horrifying.</p> <p><b>Many residents wholeheartedly accept that across the country, an increase in housing stock, of the right kind, is needed. The question is whether, in proposing such a massive housebuilding programme in the borough, DBC is acting rationally, responsibly and in the real interests of local inhabitants, or bowing to pressure from Government.</b></p> <p>There are huge questions here about whether DBC's duties to safeguard the Green Belt and the Chilterns Area of Outstanding Natural Beauty (<b>AONB</b>), and other environmental obligations, have been properly taken into account. As explained below, there are indications that DBC has misunderstood its obligations under the National Planning Policy Framework (<b>NPPF</b>) with respect to the meeting of local housing need. DBC seems to be proceeding on the basis that meeting housing need is a paramount obligation under the NPPF, whereas in reality the presumption of sustainable development in paragraph 11 of the NPPF only applies insofar as consistent with other provisions of the NPPF.</p> <p><b>In effect, this means that certain other obligations under the NPPF, inter alia regarding the preservation and protection of land designated as Green Belt, Areas of Outstanding Natural Beauty, and irreplaceable habitats, take priority over the presumption that assessed housing needs must be met. This crucial point seems not to have been recognised.</b></p> <p>The stipulations in the NPPF that Green Belt areas, Areas of Outstanding Natural Beauty and irreplaceable habitats must be protected, and where possible enhanced, are consistent with the widespread view that we are custodians of</p>

the countryside, and must wherever possible protect and enhance it – not only in an attempt to put a stop to the saddening loss of biodiversity that has occurred in recent decades, but also so that it can be enjoyed by our children, grandchildren and great-grandchildren. **As everyone recognises, once countryside has been developed on, it is lost forever. The chipping away at treasured and environmentally significant countryside to line the pockets of big developers has to stop.**

Even aside from the appalling impact that the plan will have on the natural environment if it is implemented, there are good reasons for residents to be deeply concerned about the consequences that the plan will have on their quality of life.

**It is inevitable that more than 16,500 additional homes within the borough (possibly as many as 16,900; an increase of around 25%) will have a very significant adverse impact on traffic, local infrastructure and services. Although these matters are referred to in the plan, the plan does not provide any confidence that they will be addressed in any meaningful way if the proposed development goes ahead.**

There is a lot of talk about sustainability in the draft plan, but the reality seems to be that much of the development would (even if some measures are taken to ensure energy-efficiency) be intrinsically unsustainable. For example there are many proposed development sites on the very outskirts of Northchurch and Berkhamsted. Some of these sites are a good 3-4km from the centre of Berkhamsted, which is more than most people are willing to walk with any regularity, and the local topography is not conducive to cycling. At present there is no public transport to/from these locations and it seems highly improbable that such public transport would be viable. It is all but inevitable, therefore, that inhabitants of the proposed new developments will be highly dependent on their cars, and in the short-term it is unrealistic to assume that a significant proportion of these cars will be electric. **Additional air pollution is almost guaranteed, for example in Northchurch High Street, a thoroughfare which already suffers from occasional high or very high particulate concentrations.**[1]

A further concern is with water supplies. Currently, fresh water for the area is abstracted from chalk aquifers that feed the region's chalk streams, which are rare protected habitats, highly vulnerable to long-term damage from drying out. If there is a 25% increase in the number of homes in the borough, the default position will be a 25% increase in the volume of water abstracted from the catchment areas of these chalk streams. The plan notes the problem, and states that measures will be taken to avoid to abstraction from the aquifers but the lack of specifics on this important issue is concerning.

[1] See e.g. Air Quality England air pollution report for Northchurch High Street, 1 January to 31 December 2019: [airqualityengland-statistics-report-HB013-2019link.pdf](https://www.airqualityengland.org.uk/statistics-report-HB013-2019link.pdf)

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15036
<b>Person ID</b>	1250021
<b>Full Name</b>	Hallam Land Management Ltd
<b>Organisation</b>	Hallam Land Management Ltd
<b>Agent ID</b>	1265070
<b>Agent Full Name</b>	Stacey Rawlings
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>The vision for Dacorum Borough and the main thrust of the objectives are supported. This includes the focus for growth at Hemel Hempstead with support from the market towns and larger villages; the principle of using land efficiently within existing built-up areas and the need to provide a mix of housing products including the delivery of affordable housing. However, the spatial strategy and proposed allocations do not fully reflect these objectives or the overarching vision.</p> <p>The Plan references the reliance upon adjoining authorities to meet some of its employment needs and the delivery of Hemel Garden Communities amongst other matters. As none of these matters are resolved at this second Regulation 18 consultation stage, the plan will need to be re-consulted upon again before progressing to Regulation 19 Pre-submission stage.</p> <p>A joint Strategic Plan is being prepared across the five partner authorities in South West Hertfordshire ('JSP'). The consultation draft DBLP anticipates the JSP will be in place by 2023. This is broadly consistent with the DBLP target adoption date. If the two plans progress concurrently, but separately, there is the potential for conflict to arise between the two processes if they are dealing with different growth requirements, time horizons and strategies.</p> <p>HLM note that at paragraph 1.36 DBC consider it is unlikely to be in a position to assist in helping meet unmet needs of the wider South West Hertfordshire area to 2038. Several local plans have failed over the past few years on the Duty to Cooperate, including at Sevenoaks District. The ramifications are spilling out to its neighbouring authorities who have submitted Local Plans for examination without meeting its DtC obligations.</p> <p>The spatial strategy only identifies 63% of the housing target to Hemel Hempstead despite it being, by far, the most sustainable settlement in the district as the main town. There is a strong reliance on the delivery of previously developed land and sites allocated in the previous local plan that are yet to come forward in the urban area. There is only one new greenfield allocation at Hemel which forms a first phase of a new Garden Community with no certainty on the full extent</p>

of the scheme being allocated/delivered in a future local plan for Dacorum or the neighbouring St Albans district emerging local plan. The majority of greenfield sites that provide certainty of development and are capable of delivering homes in the first half of the plan period are located within the smaller towns and larger villages, predominantly through Green Belt releases.

Whilst HLM agree with the Council that Green Belt release is inevitable and that exceptional circumstances exist to justify GB release in order to deliver a sustainable pattern of growth, the chosen sites do not represent the most sustainable strategy. There are significant concerns over the methodology and content of the interim SA, with a failure for all reasonable alternatives being considered including the ability of Hemel Hempstead to take a greater proportion of greenfield growth to optimise the delivery of development in the most sustainable location. We do not consider the draft strategy represents the most appropriate strategy and conflicts with the stated Vision and Objectives.

The spatial strategy identifies significant allocations at lower tier settlements within the AONB (e.g. Tring) and Green Belt which are disproportionate in scale and the justification for those allocations is not clear from the supporting information and available evidence. The site assessments acknowledge that other suitable Green Belt sites exist around Hemel Hempstead that are not constrained by AONB. There is no justification for this approach based on alternative sites available.

There is no mechanism in the plan if sites under deliver within the plan period. HLM express concerns over the suitability, availability and deliverability of a number of urban sites and the delivery of a first phase of a new Garden Community that is not yet identified in full in a development plan. The emerging strategy for growth lacks any flexibility to respond to change.

The suite of proposed allocations do not accord with the findings of the Council's own evidence base, and some sites are proposed at excessive densities which may not strengthen the sense of place or be sufficiently evidenced to justify the capacities proposed. The ability of the overall strategy to deliver the stated levels of affordable housing is concerning, particularly for Hemel Hempstead given the reliance on PDL sites and the (as yet unknown/unquantified) strategic infrastructure requirements of delivering a first phase of HGC in isolation.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15053
<b>Person ID</b>	1270849
<b>Full Name</b>	Ms Jessica Lindfield
<b>Organisation</b>	St William Homes LLP
<b>Agent ID</b>	210999
<b>Agent Full Name</b>	Mr Martin

	Friend
<b>Agent Organisation</b>	Director Vincent & Gorbing
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><b>VISION AND STRATEGIC OBJECTIVES</b></p> <p>Overall, St. William support the Vision and Objectives set out in the DESG. The recognition of the challenge of meeting significantly increased housing need in a sustainable manner and with a high quality of design is particularly Achieving this with the provision of adequate infrastructure to keep pace with the delivery of new homes is critical, with recognition that that the public as well as the private sector will play a key role in delivering this infrastructure.</p> <p>The recent publication by the Government of the draft revisions to the National Planning Policy Framework shows clearly the direction of travel of Government policy with regard to the presumption in favour of sustainable development with the emphasis added at 11 of promoting a sustainable pattern of development that aligns growth and infrastructure as well as the highlighting the key objective of making effective use of land in urban areas.</p> <p>In this respect, the DESG is well aligned with the draft A key theme, recognised in the overall vision, is to optimise the use of previously developed land in sustainable locations. The National Grid land is a prime example of such a site.</p> <p>St William fully support the growth agenda for Hemel Hempstead (page 23), recognising the importance of sites in the town centre and Two Waters Returning blighted brownfield land to productive use is vital to meeting local housing needs, energises local economies and relieves pressure on greenfield land. St William also support the Strategic Objectives, including the commitment to delivering the full housing requirement between 2020 and 2038.</p> <p>In transforming former gas works sites into places, St William focuses on high quality placemaking and ensures a long-term commitment to community building and enhancing biodiversity. Former Gasworks sites are unique in both use and character; they are challenging and abnormally expensive to redevelop and regenerate compared to delivery of development on other brownfield sites. In addition, they can also have ongoing operational requirements requiring physical infrastructure and easements which can considerably reduce the developable site area. The further challenge for any developer on these typically complex sites is the quantum of upfront costs required to make the sites adequate for residential delivery.</p> <p>St William is committed to ensuring the highest viable level of climate change mitigation and adaptation whilst recognising that this must be balanced against deliverability of new development and the overall sustainability objective of providing for new homes and contributing to the Council's housing targets and Objectively Assessed Need.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15077

<b>Person ID</b>	1162751
<b>Full Name</b>	Watford Borough Council
<b>Organisation</b>	Principal Planning Officer
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	We welcome the progress made towards identifying a strategic growth strategy and consider that further work on this has been done in a positive, collaborative manner. We support of the housing land supply evidence and note that it results in a surplus housing figure which has potential to provide for unmet need from surrounding boroughs.
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15092
<b>Person ID</b>	1270925
<b>Full Name</b>	Mrs Kathryn Salway
<b>Organisation</b>	Extinction Rebellion Dacorum
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	Climate Change Emergency The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction.

The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.

#### Overarching Vision: Environmental Sustainability

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

#### Overarching Vision: Economic Growth

In addition to the Enviro-Tech aspirations in the plan we wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

#### Berkhamsted & Tring Developments

We welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

The plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15115
<b>Person ID</b>	1222814
<b>Full Name</b>	Alex MacGregor
<b>Organisation</b>	Senior Planner Quod Ltd (ON BEHALF OF PIGEON INV MAN LTD)
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<p>Pigeon Hemel Hempstead Ltd supports and welcomes that DBC recognises in the overarching vision the significant role HGC will have in transforming Hemel Hempstead and taking forward the legacy of the New Town through the delivery of high quality new homes, green spaces, green businesses, and community facilities.</p> <p>Pigeon Hemel Hempstead Ltd also welcomes DBC's commitment within the vision to deliver its identified housing requirement between 2020 and 2038.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15124
<b>Person ID</b>	1270940
<b>Full Name</b>	
<b>Organisation</b>	CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Comment</b>	<p>Section 3 of the Emerging LP has regard to the <i>Borough Vision to 2038</i> and Bovingdon Parish Council (BPC) recognises and supports The Vision for Dacorum's Places as it relates to Bovingdon.</p> <p>However, BPC would require the Council to recognise that this growth should be at a level that is wholly sustainable to the extent that any new development within the settlement will not place adverse burdens or overstrain existing services and infrastructure to the extent that it will be detrimental to the settlement in the future.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15146
<b>Person ID</b>	1270945
<b>Full Name</b>	
<b>Organisation</b>	NORTHCHURCH PARISH COUNCIL
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>Northchurch Parish Council (NPC) has not found one person who believes that Dacorum's vision or strategic objectives are right for the Borough.</p> <p>Dacorum's Vision 1.37: "For housing, we are making a bold commitment to significantly increasing the supply of land to deliver 922 dwellings per year, more than double the number (430 dwellings per year) in the previous Core Strategy."</p> <p>The views of Northchurch residents reflect those of the country at large. For example, In October 2020, when the government consulted on its proposed changes to the planning system, respondents expressed concerns that "the distribution of need was not right...too much strain was being put on our rural areas, and ... "in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt."</p> <p><a href="https://www.gov.uk/government/consultations/changes-to-the-current-planning-system">https://www.gov.uk/government/consultations/changes-to-the-current-planning-system</a> to come government response to the local housing need proposals in changes to the current planning system</p>

The views of Northchurch residents reflect those of people across the Borough. For example, only 5% of people who responded to Dacorum's 2017 Local Plan Issues & Options agreed with Dacorum's proposed approach to Green Belt and Major Developed Sites.

[http://www.dacorum.gov.uk/docs/default-source/strategic-planning/appendix-6-q9-to-q11-i-and-o-consultation-report-of-responses-september-2019.pdf?sfvrsn=6b530c9e\\_6](http://www.dacorum.gov.uk/docs/default-source/strategic-planning/appendix-6-q9-to-q11-i-and-o-consultation-report-of-responses-september-2019.pdf?sfvrsn=6b530c9e_6)

The views of Northchurch residents also reflect those of Dacorum's Borough Councillors, none of whom appear to agree with this "bold commitment" to double the number of dwellings. On 18 November 2020, Dacorum Borough Councillors voted unanimously in favour of a motion expressing concern about the effects on the borough of having to deliver 922 dwellings per year. On 20 November 2020, the Leader of Dacorum Borough Council wrote to the Secretary of State saying that the housing figure was too high and would harm the Green Belt:

"At the moment the housing target generated by both current and proposed standard housing methodologies ignore these constraints and produces a figure well in excess of the Office of National Statistics projection of housing need based on the 2018 figures, if this is accepted it would result in a reduction in the annual target and therefore would help to reduce the current figure suggested for Dacorum which is currently 922 per annum, a level of growth that can only be achieved with significant development in the Green Belt".

So, neither residents nor councillors, support Dacorum's vision.

NPC believes that Dacorum's vision is fundamentally flawed because it is based on out-of-date 2014 household projections which over-estimate demand and prioritise growth at the expense of other considerations such as the importance of the Green Belt:

The vision would have a devastating effect on the 2800 people who live in Northchurch. New developments would add over 1500 new residents to Northchurch, a population increase of over 50%. The additional buildings and residents would destroy the semi-rural character of Northchurch and the quality of life for local people.

Northchurch is a large village with its own distinct appearance, community, and semi-rural character but the vision does not even mention Northchurch; it has been whitewashed from existence.

Northchurch predates the neighbouring town of Berkhamsted: the parish church of St. Mary is one of the oldest churches in Hertfordshire; the two-storey half-timbered alms-houses in the Conservation Area were built in the 15th and 16th centuries. Northchurch has two conservation areas and includes the hamlets of Dudswell, Norcott Hill, Northchurch Common and part of the Cow Roast.

The overarching character of Northchurch is that of a large village, within a semi-rural area. Most dwellings are set to the south of the Grand Union Canal, elevated from the valley bottom with sloping hills across Green Belt to the north and south. Our houses have a different style to Berkhamsted. In contrast with the tall, Victorian, high-density, London-style red-brick houses, common in Berkhamsted, the core of 1940s and 1950s dwellings broadly found in the south eastern part of Northchurch create a strong design identity. Here, most buildings have simple brickwork alleviated in part by

angled front bays and front tile hanging. A wide-open feel is created by the low density (around 15 dwellings/ha), roadside verge planting and dwellings set back from the road.

In terms of demographics, people of Northchurch are older and less affluent than those of Berkhamsted. Unlike Berkhamsted, a town with many large, impersonal shops, Northchurch has just a handful of small shops and only one pub where customers recognise each other.

The roads in Northchurch are also different from Berkhamsted. In the part of Berkhamsted to the East of the proposed developments, roads running north/south, from the High Street uphill towards Shooters Way are heavily parked and busy with traffic. In contrast, Northchurch Lanes are much quieter. For example, Darrs Lane, which edges the Chiltern Area of Outstanding Natural Beauty, and Bell Lane, which runs between the two Green Belt fields, are narrow with steep grassy banks and hedging. They are country lanes.

The Green Belt fields that lie between Berkhamsted and Northchurch fulfil the primary aim of Green Belt policy: to prevent urban sprawl. They act as a buffer between the town of Berkhamsted and the village of Northchurch. They stop the communities of Berkhamsted and Northchurch from merging into each other. The proposed developments fill these fields with houses which means that Berkhamsted and Northchurch become one. Dacorum have not included the Bulbourne Cross proposal in the Local Plan, despite its advantages, because it would join Berkhamsted to Bourne End. The proposed developments in Northchurch do the same thing: they join Berkhamsted to Northchurch.

So Dacorum's vision fails to preserve the special character and community of Northchurch.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15170

**Person ID**

1270993

**Full Name**

MRS MERRIL TRUEMAN

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Heme! Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements .

I strongly object to the proposal that Tring is required to " play a much greater role in delivering housing growth " within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Heme! Hempstead with the remaining growth shared equally between the remaining settlements .

Whilst I accept that the aspirations *for* existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has " delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. " This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the

existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the **Area** of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15180
<b>Person ID</b>	1270998
<b>Full Name</b>	PAUL HARRIS
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to " play a much greater role in delivering housing growth " within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has " delivered a comprehensively planned new neighbourhood to the east of

the town in a way that takes account of sensitive views, landscape or protected environmental sites. " This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15190

**Person ID**

1142578

**Full Name**

Mr Norman Brooks

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Decorum raised within this Local Plan - a 25% growth (16,596 houses) in housing, there is no evidence to support this 25% growth, especially considering there is a 9 1/2 (5,950 houses) population growth forecast by the ONS in Decorum for the same period. I believe there is enough non-green belt land identified within the Decorum

Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only 11.13% growth in housing in these **settlements**.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate *Green Belt* allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

I

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable

damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

• • t

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two Primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and end land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15201

**Person ID**

1264623

**Full Name**

Judy Chaussalet

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I object to Dacorum's Emerging Strategy for Growth on a number of grounds.

Green Belt: Our Green Belt is a critical part of our heritage - and is critical to maintaining the health and wellbeing of our area. This plan presents a significant threat to the Green Belt and also, by proximity, to the Chilterns AONB. This is extremely short-sighted and totally unacceptable. The council has not shown 'exceptional circumstances' to justify Green Belt release. There is no consideration of sustainable development - these proposals have not been made with future generations in mind, the loss of Green Belt will be irreversible and damaging. If implemented, these proposals would result in the loss of a massive 850 hectares of Green Belt, wider countryside and urban green space - this would cause irreparable harm to the environment, ignoring the council's own climate emergency declaration.

Climate Emergency: The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction. The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas (“GHG”) emissions.

Environmental Sustainability: The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. Dacorum should be aiming to be at the forefront of this transition but the development plan shows little vision nor innovation to do so. We need an urgent move to public transport that is electrified and at construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. Plans should be in place for power to be supplied by electricity or hydrogen generated from sustainable energy sources.

Overprovision of Housing: The housing targets are too large, they are based on out-of-date data and they have not been considered within the context of the constraints imposed by an area that is 85% rural, 60% Green Belt and 33% AONB. Furthermore, these proposals underestimate the potential to provide housing on existing developed sites, nor do they take into account recent government changes to permitted development rights (allowing conversion of commercial premises to residential use) at a time when Covid-19 has forever changed office and commuter work patterns, allowing an escape from London-centric over-development in the South-East and permitting investment and levelling up across the country.

Infrastructure: Finally, the huge impact on local infrastructure has been disregarded - the proposed level of development would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan does little to address improvements required to support these proposals - with water supply and waste water disposal being of particular concern.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15202
<b>Person ID</b>	1271003
<b>Full Name</b>	Thierry Chausalet
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p>I object to Dacorum's Emerging Strategy for Growth on a number of grounds.</p> <p><u>Green Belt</u>: Our Green Belt is a critical part of our heritage - and is critical to maintaining the health and wellbeing of our area. This plan presents a significant threat to the Green Belt and also, by proximity, to the Chilterns AONB. This is extremely short-sighted and totally unacceptable. The council has not shown 'exceptional circumstances' to justify Green Belt release. There is no consideration of sustainable development - these proposals have not been made with future generations in mind, the loss of Green Belt will be irreversible and damaging. If implemented, these proposals would result in the loss of a massive 850 hectares of Green Belt, wider countryside and urban green space - this would cause irreparable harm to the environment, ignoring the council's own climate emergency declaration.</p> <p><u>Climate Emergency</u>: The Climate Change Emergency needs to be at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon emissions by 2030 and minimising carbon emissions during any construction. The Climate Change Emergency is rightly a headline statement in the plan, but there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas ("GHG") emissions.</p> <p><u>Environmental Sustainability</u>: The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. Dacorum should be aiming to be at the forefront of this transition but the development plan shows little vision nor innovation to do so. We need an urgent move to public transport that is electrified and at construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. Plans should be in place for power to be supplied by electricity or hydrogen generated from sustainable energy sources.</p> <p><u>Overprovision of Housing</u>: The housing targets are too large, they are based on out-of-date data and they have not been considered within the context of the constraints imposed by an area that is 85% rural, 60% Green Belt and 33% AONB. Furthermore, these proposals underestimate the potential to provide housing on existing developed sites, nor do they take into account recent government changes to permitted development rights (allowing conversion of commercial premises to residential use) at a time when Covid-19 has forever changed office and commuter work patterns, allowing an escape from London-centric over-development in the South-East and permitting investment and levelling up across the country.</p> <p><u>Infrastructure</u>: Finally, the huge impact on local infrastructure has been disregarded - the proposed level of development would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan does little to address improvements required to support these proposals - with water supply and waste water disposal being of particular concern.</p>
<b>Included files</b>	

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15224
<b>Person ID</b>	1271006
<b>Full Name</b>	Ms Zoe Wiggins
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<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>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15242
<b>Person ID</b>	1271086

<b>Full Name</b>	MRS PATRICIA BEL-BARKO
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Bell to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Bell and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15280

**Person ID**

1161497

**Full Name**

Mr Robert Sellwood

**Organisation**

The Crown Estate

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<p><u>Chapter 2 : Vision and Strategic Objectives</u></p> <p>The Hemel Hempstead 'Vision' is supported since it clearly establishes the critical importance of Hemel Garden Community in delivering the transformation of the town through the provision of new housing, jobs and infrastructure plus the creation of new areas of open space.</p> <p><u>Chapter 3 : Borough Vision to 2038</u></p> <p>The Borough Vision is supported.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15324
<b>Person ID</b>	1271128
<b>Full Name</b>	Little Gaddesden Parish Council c/o Cllr John Saner
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>In our view Central Government's demand for 17,000 new homes in Dacorum is based on housing estimates which have been shown by the ONS to be a significant over-estimate probably by a factor of 2.</p> <p>Furthermore, since the estimates were originally produced, no account has been taken of the changes to employment, shopping and living patterns which will almost certainly arise from or be accelerated by</p>

the pandemic, and which will result in more currently commercial and retail space becoming available for repurposing as residential.

In trying to comply with Central Government's demands, the plan places too much emphasis on development on Green Belt land, rather than maximising the use of brownfield sites. Of the proposed new housing, 60% is proposed on green belt land involving the loss of about 850 hectares of green belt. This is inappropriate in Dacorum, situated as it is, close to and partly in the Chilterns AONB

If the housing projections are almost double current ONS estimates and more commercial and retail buildings become available for alternative use because of pandemic accelerated change, there will be scope for more development on brownfield sites and less need for building on the Green Belt.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15339

**Person ID**

1271220

**Full Name**

MAUREEN RUMSEY

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15352

**Person ID**

1145662

**Full Name**

Mrs Catherine Anderson

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - a 25% growth (16,596 houses) in housing, there is no evidence to support this 25% growth, especially considering there is only a 9% (5,950 houses) population growth forecast by the ONS in Dacorum for the same period. I believe there is enough green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead- a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Marley should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to • play a much greater role In delivering housing growth• within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth propoal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be If the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has• delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. • This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for Its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. There is particular need for as much affordable housing as possible. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

However the requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15376

**Person ID**

1248890

**Full Name**

Mr Stuart Oldroyd

**Organisation**

Whiteacre Ltd

**Agent ID**

1270853

**Agent Full Name**

Jon  
Goodall

**Agent Organisation**

DLP Planning Limited

**Yes / No**

\* Yes

\* No

**Comment**

Whiteacre supports the Council's overarching vision for Dacorum's New housing will need to be provided in sustainable locations to a high standard of design. Affordable housing should be provided and be 'genuinely affordable', having regard to local circumstances and new homes to have met the needs of older people, people with disabilities and those with specialist needs.

The overarching vision for Dacorum aims to deliver significant uplift in growth required in a sustainable way across the Borough, seeking out opportunities to regenerate Hemel Hempstead and to continue to act as a catalyst for its transformation. The Council acknowledge that they cannot accommodate all the growth within the urban area, so would need to release land in the Green Belt, which Whiteacre supports.

However, while the large villages of Bovingdon, Kings Langley and Markyate provide a reasonable level of services and facilities, the Council state that they are relatively constrained in terms of local infrastructure. The strategy proposes only modest levels of growth in these settlements, limited to infrastructure developments.

Whiteacre supports the objective to maintain and enhance the sustainability of large villages and to enable the delivery of infrastructure to support development. The current vision for Dacorum's places states that:

*“Bovingdon, Kings Langley and Markyate will have grown and will:*

- have provided increased levels of affordable homes;
- have strengthened their role in providing services and facilities to serve residents and the adjacent rural communities; and
- have secured additional and improved local community facilities”.

In our view, we consider that the vision for Bovingdon should be strengthened to include specific references to local community facilities, including schools and elderly care facilities. Bovingdon is also prone to surface water flooding and therefore environmental objectives should be enhanced within the overarching vision for Bovingdon.

While there is no objection to these objectives in principle they do not fully accord with the Council’s justification for the spatial strategy and site selection. For example, there is no reference to reserving land for a new 3FE Primary School and ‘future-proofing’ the infrastructure requirements for any future growth.

The proposed allocation Growth Bv01 does not set clear criteria for flood alleviation works. The draft Plan states that any development will need to have regard to the recommendations of the Level 2 Strategic Flood Risk Assessment for this site. – the Level 2 assessment will comprise further analysis for any site identified as ‘at risk’ in the Level 1 SFRA, so is not part of the evidence base for consultation. However, the site assessment evidence supporting the proposed allocation at Grange Farm clearly illustrates how benefits to surface water drainage can be achieved and this should be clearly reflected in relevant policy criteria from the outset, as a key component of the Delivery Strategy.

### **Suggested Modifications to the Vision for Dacorum’s Places**

The ability to address the draft Plan’s relevant objectives need to be read together as part of the case for exceptional circumstances.

We therefore suggest that the vision for Bovingdon is amended to:

*“Bovingdon, Kings Langley and Markyate will have grown and will:*

- have provided increased levels of affordable homes;
- have strengthened their role in providing services and facilities to serve residents and the adjacent rural communities;
- have secured additional and improved local community facilities, **including local schools and elderly care facilities, and a hierarchy of open spaces:**
- **have benefitted from further investment in mitigating surface water flooding, particularly in Bovingdon**
- **have reduced existing traffic levels on the High Street”.**

We consider that Dacorum Borough Council’s draft Local Plan has a clear vision and delivery strategy for Bovingdon, and the draft allocation of Grange Farm in Bovingdon can achieve a sustainable development of 150 homes, including significant benefits to the community over other sites that have already been assessed. This will be assessed in more detail in subsequent chapters.

- Whiteacre supports the Council’s overarching vision for Dacorum’s places. New housing will need to be provided in sustainable locations, including large villages, to a high standard of design.

- Whiteacre considers that the vision for Bovingdon should be strengthened and modified to include specific references to local community facilities, including schools and specialist elderly housing. Bovingdon is also prone to surface water flooding and therefore environmental, flood protection and mitigation objectives should be enhanced within the overarching vision for Bovingdon.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15393

**Person ID**

1271257

**Full Name**

Mr Alastair Hogben

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to " play a much greater role in delivering housing growth " within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. " This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15405

**Person ID**

1259631

**Full Name**

Fay Copestake

**Organisation**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>A great deal of green belt land would be destroyed and this would have a very negative affect on air quality, and the wildlife in this area including loss of ancient woodland and hedges. I have concerns regarding flooding and drainage, as I have seen new build properties in other parts of our country built with little consideration regarding this matter and new house owners/ tenants have suffered the consequences.</p> <p>I feel more attention should be focused upon brownfield land which may already have some infrastructure in terms of sewage pipes and electricity. Digging up green belt land to lay pipes and put in electricity lines, etc would be much more costly and detrimental to the environment.</p> <p>I understand and agree that there needs to be an increase in housing for Hemel Hempstead, but where possible brownfield land should be utilised and local services improved to prevent urban decline/ decay. There needs to be greater healthcare facilities for the whole area and Hemel Hempstead Hospital should be part of this vision, providing the service and purpose for which it was built, refurbishing and expanding it, not leaving it as it is.</p> <p>I disagree and object with the proposal that Tring is required to play a much greater role in delivering housing growth. To more than double it's size is detrimental to the town, this idea would mean destruction of huge areas of green belt land. This is a disproportionate amount, failing to acknowledge the building contributions of the surrounding towns and villages.</p> <p>The planned new neighbourhood to the east of Tring has not taken into consideration the important issues around conservation, air quality and protection of wildlife, hedgerows and trees. I have concerns that this move will eventually make Tring part of a conurbation to a larger town, swallowing up its existence with the other small towns and villages and extinguishing its Market Town status - this has happened in other parts of this country.</p> <p>Already, a large number of houses are being built by Tring cemetery which will have an affect on the surrounding area. For Tring and surrounding Villages, consideration must be taken with regard to using already given existing brownfield areas and existing properties that could be renovated. Delivery of sports facilities and open space is welcomed, improved cycling paths.</p> <p>More trees and open spaces sounds good, but this contradicts protection of the more important green belt land.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15430
<b>Person ID</b>	1271103

<b>Full Name</b>	GRAHAM RITCHIE
<b>Organisation</b>	FAIRFAX STRATEGIC LAND (HEMEL) LTD
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	see attached response
<b>Included files</b>	<a href="#">Piccotts End Dacroum LP Emerging Strategy for Growth form.pdf</a>
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15431
<b>Person ID</b>	1271088
<b>Full Name</b>	MIKE WALTERS
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing. it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p>

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to "play a much greater role in delivering housing growth" within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15443

**Person ID**

350823

**Full Name**

Mrs Sue Yeomans

**Organisation**

Chairman  
Chilterns Countryside Group

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

DBC's vision for the Borough

- This Local Plan (LP) sets out the Council's vision for the Borough for the next 18 years to Whilst we welcome the statements set out in this vision, the Group does not find these to be fulfilled by the proposals of the LP.
- In December 2017, the CCG made a substantial response to the DBC Issues & Options Consultation Local Plan to 2036, which as DBC then stated, would inform the next stage. It is therefore of great concern that this revised LP appears to have completely ignored the critical issues identified by CCG & others in 2017, in particular:
- setting figures which DBC identify (LP. 7.7) as '*ambitious*' for perceived housing demand within the Borough; housing provision should be based upon **need**, rather than speculative demand

- release of Green Belt for development without substantive factual reasons demonstrating the '*exceptional circumstances*' as required by the National Planning Policy Framework
- reliance on possible Government intentions, rather than statutory obligations. Indeed, the new LP continues to ignore recent strengthening in publicly announced Government policy (December 2020) on urban re-generation, particularly in the North & the Midlands and the need to protect Green
- The LP identifies the 3 main towns of the Borough: Hemel Hempstead, Berkhamsted and Hemel Hempstead is the larger town with greater scope for supporting expansion and infrastructure. All 3 have good access to London and larger conurbations such as Watford and Milton Keynes by road and rail. The proposed expansion of London Luton and Heathrow Airports is of concern from increased operations, road traffic, air, visual and noise pollution.
- From a relatively small Old Town, housing at Hemel Hempstead has specifically been developed as 'spokes' of a wheel emanating from that centre, incorporating purpose-built main and local shopping centres, green spaces, schools for all ages, community facilities and churches. Provision of appropriate health care facilities remains a contentious issue. Major and significant investment has been expended upon the town, businesses and its retail centre, which can easily support and would indeed welcome increased footfall, employment opportunities and income generation, some of which may now, indeed, facilitate urban regeneration for
- Berkhamsted and Tring, in particular, are smaller traditional 'ribbon' market towns with historical centres, where housing & associated infrastructure have grown organically. Education and healthcare present challenges to accommodate existing population. Both towns are surrounded by the Chilterns Area of Outstanding Natural Beauty (AONB) and significant swathes of Green Belt, which define and inform the characters of the towns and the AONB
- As identified in pts 1.iii – 1.v, the Borough's three main towns are very different with hugely varying abilities to support and sustain large increases in This is insufficiently taken into account in calculating population growth and housing needs across the Borough.
- The CCG believes this LP to be developer As such it not only fails to fulfil the vision of DBC but also fails to future-proof the intrinsic character and sustainability of the Borough for its present and future residents.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS15478
<b>Person ID</b>	1271381
<b>Full Name</b>	Alison Walker
<b>Organisation</b>	Associate Director of Strategic/Large Projects Thakeham Homes
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<ul style="list-style-type: none"> <li>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</li> <li>The overarching Vision for Dacorum is supported by a series of sub-visions for the key areas in the Borough. The vision for Berkhamsted is for it to have grown and that it will: <p><i>"be an inclusive market town that meets the needs and aspirations of existing and new residents and visitors;</i></p> <p><i>have delivered comprehensively planned new neighbourhoods to the south and southwest of the town in a way that takes account of sensitive views and landscape;</i></p> <p><i>have provided significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town; and</i></p> <p><i>have delivered a mix of market and affordable housing, new community facilities, including two primary schools and a secondary school, and a hierarchy of open spaces."</i></p> </li> </ul>

- Whilst we support the principle of the key elements the vision for Berkhamsted encompasses, we question whether the Local Plan as currently drafted will result in the achievement of this vision as we will explore through these representations. It is critical that the Council's vision is clearly translated into the Local Plan policies to ensure its delivery and to meet the needs and aspirations of the local communities

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15499

**Person ID**

400475

**Full Name**

Mr Michael Demidecki

**Organisation**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

No

\* Yes

\* No

**Comment**

Tring Homes (page234)

There are far too many homes proposed for Tring. The town currently has a population of around 12,000 people and the Local Plan up to 2,720 dwellings over the period 2020-2038. Most of these (around 2,200 dwellings ) would be on Green Belt Land in Growth Sites TR01 (Dunsley Farm), Tr02 (New Mill) and TR03 (East of Tring). Paragraph 136 of the National Policy Framework (NPPF) provides that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”. The Council has failed to justify that this test of exceptional circumstances has been met so as to justify a significant intrusion into the Green Belt at Growth sites Tr01 – TR03 to the East of Tring. The proposed development would result in a doubling of the built up area of Tring and significantly detract from its current status as a country market town. It could result in a population increase of around 10,000 people and would alter the character of the town. The huge growth area planned for the area east of Tring would see the loss of much open countryside and wildlife habitat. While the need for some additional homes of course is appropriate the total figure envisaged is too high and should be reduced.

This would allow for some green space between developments such as those planned for Growth Area Tr01 (Dunsley Farm) and Growth Area Tr03 (East of Tring). I would refer to my specific comments as to how this could be achieved in my response to Question 5 below.

**Included files**

<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15513
<b>Person ID</b>	1162394
<b>Full Name</b>	Grahame Senior
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Comment</b>	<p>I think the overall “vision” pays lip service to the dictates of central government based on an over simplistic view of the likely needs of the community. Projections about future needs and growth are seldom correct in the outcome. The most important strategic driver should be preserving the integral balance of communities and their physical assets rather than wholesale expansion to tick the boxes of notional needs.</p> <p>The value of the environment should be paramount and that needs to be cherished and sensitively considered.</p>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15555
<b>Person ID</b>	1264530
<b>Full Name</b>	BRENDA AND ROY HURLEY
<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

## Comment

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

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Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites." This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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I welcome the requirement to provide a **mix** of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15575
<b>Person ID</b>	1271579
<b>Full Name</b>	
<b>Organisation</b>	BOYER PLANNING ON BEHALF OF W LAMB LTD
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Comment</b>	<ul style="list-style-type: none"><li>We support the Overarching Vision and agree that new housing should be provided in sustainable locations, such as Land at Shendish. We also agree that specialist housing for older persons should be incorporated into larger new developments. The Vision also seeks to ensure high quality design and sustainable outcomes, all of which</li></ul>

accord with the principles set out in the Shendish Vision Document. We also support the requirement for growth to be accompanied by supporting services and infrastructure which are delivered at the right time and benefit new and existing communities, particularly in relation to education. Land at Shendish can not only make on site provision for a primary school with pre-school nursery site to serve the new community, but also to serve an existing shortfall that has been identified in Kings

- As the draft Plan has not planned for sufficient housing to meet the needs of Dacorum over the plan period, the text under Hemel Hempstead should be amended to include for a new neighbourhood on Land at Shendish, as the most sustainable site option available to assist in meeting this
- Under the Kings Langley heading, there should be reference to the need for Primary School site, given that there is already an under provision in the area.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15603

**Person ID**

1271748

**Full Name**

Ms Gosia Turczyn

**Organisation**

Wigginton Parish Clerk  
Wigginton Parish Council

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

Whilst Wigginton Parish Council agrees with the principles behind the vision, it has very serious concerns regarding the implementation of these.

For instance, the vision expects that by 2038:

a) "All settlements will have retained their separate and distinctive identities"

In the particular case of Tring, this cannot possibly be achieved by such a massive increase in the size of the town that will overwhelm its historic character.

b) "The natural beauty of the Chiltern Hills and the varied character of the countryside will have been enhanced"

There are no proposals whatsoever in this plan to enhance the natural beauty of the Chilterns AONB. The plan will achieve quite the opposite by causing undue harm due to the very close proximity of the Tring allocations to the nearby scar slope, a distinct and important feature of the AONB. In fact, very little consideration has generally been given to the importance of the AONB in the various assessments carried out on behalf of Dacorum. Whilst mitigation is required under DM27 and considered necessary for the Tring allocations, no evidence has been provided how this could possibly be achieved given the elevated nature of the AONB relative to these sites, i.e., overlooking them.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15635

**Person ID**

1271974

**Full Name**

EMILY FORD

**Organisation**

SENIOR PLANNER

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Comment**

- Croudace support the principles of the proposed vision as set out on pages 22-24 of the draft Key features of the Borough are appropriately referenced within the vision, ensuring it is location-specific, and the vision covers environmental, social and economic matters so as to look holistically at sustainable development.
- In particular, the vision for new homes to be provided in sustainable locations to a high standard of design is Croudace control land to the west of Berkhamsted, at Rossway Farm, which presents an opportunity for high quality

new homes, sustainably located on the edge of Berkhamsted as we detail further within Section 7 of these representations.

- In this regard, the vision for the delivery of a new neighbourhood to the west of Berkhamsted, providing a mix of market and affordable housing, open spaces and associated infrastructure is supported and it is recognised that this will minimise the impact on the sensitive landscape surrounding the settlement to provide for a more balanced east-west growth to the town, and limit impact on the better performing Green Belt
- The strategic objectives identified within the draft Plan are also broadly Fundamentally, delivering the identified housing requirement between 2020 and 2038 through well designed development in sustainable locations which is considered key to achieving the ambitious objectives. To this end, Croudace support a proactive approach to delivering development in the Borough which has positive regard to balancing economic, environmental and social objectives as set out in the NPPF.

**Included files**

**Consultation Point**

Borough Vision to 2038

**Comment ID**

EGS15662

**Person ID**

1272282

**Full Name**

Plato Estates

**Organisation**

c/o DLP Planning

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment**

- We support paragraph 2.4 of the Dacorum Emerging Strategy for Growth which recognises the need to meet the housing needs of older people by stating, *“The right types of housing should be provided in the right location, and at the right time to meet the changing housing needs of all members of our communities, particularly the ageing population”*.

**Included files**

**Consultation Point**

Borough Vision to 2038

<b>Comment ID</b>	EGS15663
<b>Person ID</b>	1272282
<b>Full Name</b>	Plato Estates
<b>Organisation</b>	c/o DLP Planning
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<ul style="list-style-type: none"> <li>We broadly support the 'Overarching Vision' for Dacorum, however, in the second paragraph we feel there should be emphasis on ensuring the delivery of specialist accommodation needs in addition to 'new homes'. This would then better align with Planning Practice Guidance which states that provision of appropriate housing for people with disabilities (including older people) should include specialist and supported accommodation (PPG ref. 63-002-20190626). We suggest that the second paragraph of the 'Overarching Vision' should be amended to say: <i>"New housing will have been provided in sustainable locations to a high standard of design. Affordable housing will have been provided and been genuinely affordable having had regards to local circumstances and new homes <u>and specialist accommodation</u> to have met the needs of older people, people with disabilities and those with specialist needs. New housing will have delivered our ambitious place- shaping objectives and secured high quality design and sustainability outcomes. All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place."</i> (additional suggested wording is underlined)</li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15664
<b>Person ID</b>	1272282
<b>Full Name</b>	Plato Estates
<b>Organisation</b>	c/o DLP Planning
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<ul style="list-style-type: none"> <li>In respect of the 'Vision for Dacorum's Places', the final section that relates to development in the Countryside and other small villages should be amended so that it does not restrict all forms of development in these places where some limited forms of development may be needed to meet local needs and help support these existing settlements. We therefore suggest that the first bullet point in this section of the 'Vision for Dacorum's Places' is amended as follows:  <i>"The Countryside and other small villages will:</i> <ul style="list-style-type: none"> <li><i>be protected from <u>inappropriate</u> development..."</i></li> </ul> </li> </ul>
<b>Included files</b>	
<b>Consultation Point</b>	Borough Vision to 2038
<b>Comment ID</b>	EGS15665
<b>Person ID</b>	1272282
<b>Full Name</b>	Plato Estates
<b>Organisation</b>	c/o DLP Planning
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Comment</b>	<ul style="list-style-type: none"> <li>We support the proposed 'strategic objectives' for the plan, in particular the ambition to <i>"To meet the needs of older people and other groups who need specialist housing"</i>. However, we believe this should be expanded to ensure that it makes clear that the Local Plan will help provide housing as well as other specialist forms of accommodation, such as residential care We therefore suggest that this third bullet point listed under 'Delivering Dacorum's future with Homes for Everyone' is amended as follows:  <i>"To meet the needs of older people and other groups who need specialist housing <u>and other specialist forms of accommodation</u>"</i></li> </ul>

This will make clear that the Local Plan seeks to address the housing and accommodation needs of all groups, in line with paragraph 59 of the National Planning Policy Framework (NPPF).

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS15707

**Person ID** 1273151

**Full Name** Ms Megan Green

**Organisation** Senior Planner  
Thakeham Homes Ltd

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Comment** **Overarching Vision for Dacorum's Growth by 2038**

Thakeham supports 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.

Whilst we support the principle of the key elements the vision for Bovingdon encompasses, we question whether the current draft Local Plan will result in the achievement of this vision. It is critical that the Council's vision is clearly translated into the draft Local Plan to ensure its policies meet the needs and aspirations of the local communities.

**Included files**

**Consultation Point** Borough Vision to 2038

**Comment ID** EGS15751

**Person ID** 1271978

**Full Name** JOANNA HARLEY

<b>Organisation</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Comment</b>	<p><b>Berkhamsted Town Council</b> notes the comment in Para 1.28 and 1.29 on page 9 of the draft Plan:</p> <p><i>“1.28 - The Local Plan has been prepared in accordance with current Government guidance. To be found “sound” the Local Plan needs to comply with the NPPF, specifically paragraph 35, which requires Plans are:</i></p> <p style="padding-left: 40px;"><i>1 <b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbourhood areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</i></p> <p><i>1.29 – However, we are a very constrained area with significant amounts of our borough in the Green Belt. We also have a considerable amount of high quality landscape as part of the Chilterns Area of Outstanding Beauty (AONB), which is a national landscape designation shared only by relatively few other authorities across the country. We are also home to parts of the Chilterns Beechwoods Special Area of Conservation (SAC) which is an ecological site of international importance. These are significant constraints which influence the locations for new development in the Borough.”</i></p> <p>The subsequent comments serve to alight on the numbers designated [SP2] 16,596 dwellings (viz 922 pa) over the Plan period 2020 – 2038. We remain unconvinced that this number (nor the 1023 pa) should be adopted for the Plan Period given that ONS projections based on 2018 data indicates the annual need is around 350 dwellings pa. Moreover, this contrasts with the current Adopted Plan (Core Strategy 2013 – 2036) that settled on 430 pa.</p> <p>Starting from a premise that is suspect and therefore contentious, the overarching Vision is questionable; the prospective high build rate will adversely impact the principal urban centers and especially the unwarranted loss of swathes of Green Belt, including around Berkhamsted/Northchurch, that are designated in the Draft Local Plan as ‘Growth Areas’.</p> <p>Further discussion on the matter is set out in Q 7</p> <p>This section relates to proposals set for Berkhamsted and Northchurch [considered in the Draft Local Plan as West Berkhamsted]: over the planned period 2200 dwellings are scheduled [SP2- 3b] of which around 500 are in Northchurch Parish and 1700 in Berkhamsted. This equates to a substantial increase in the number of dwellings in Berkhamsted/Northchurch of around 24% - over the 18-year Plan period and where most of the designated sites are currently in the Green Belt at some distance (3 – 4 km) from the town centre and station at the top of steep valley sides. We cannot see how new housing developments at this distance (and difference in elevation) from main services infrastructure can be considered as “sustainable”.</p>

As recognised in Para 23.119 [Page 225] the Town experiences a high level of congestion:

*“223.119 – As a settlement area, the County Council consider that Berkhamsted already has a sustainable transport network in place. There is an excellent mainline railway service to London and the town forms part of a key inter-urban Aylesbury- Hemel- Watford bus route. However, they identify congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.”*

The following paragraph says: “there are few opportunities for new road capacity in the town”. As a town set in a valley with only one main crossing the county’s engineers comment the traffic lights already operate at over capacity. This results in residents choosing to avoid the main roads in the town centre or travelling to shop elsewhere.

The Draft Plan continues:

*“23.121 – Given their ‘edge of town’ locations, the strategic Growth Areas will need to focus on ensuring they are well connected, accessible to the town centre and railway station, and public and sustainable transport options are enhanced. All Growth Areas will be required to provide for on and off-site measures to alleviate local highway problems.”*

The last sentence is an aspiration without a foundation to support it: the Plan offers no substantive detail that necessary strategic infrastructure or sustainable transport options, to provide access to the town centre and station, from the proposed development sites, other than by car, have been planned for.

The referenced ‘Berkhamsted and Tring Sustainable Transport Strategy’ [Para 23.122] is nothing of the sort, mapping as it does junction enhancements at relatively minor side roads and crossings within the urban area and new/ widened footpaths along Shootersway. In the absence of a well-considered Strategic Transport Plan that addresses the critical issues, and its inclusion in the Infrastructure Development Plan, Berkhamsted Town Council does not support this Draft Plan to accommodate the Sites designated.

**Included files**

## 4 - Sustainable Development in Dacorum responses

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7
<b>Person ID</b>	1253652
<b>Full Name</b>	erica vilkauls
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The premise of all of this is flawed. Population will not be growing post Brexit. There is no justification for paving over the countryside for housing in Dacorum. Please refer to our MP who has spoken about his opposition t this building in the House of Commons. he doesn not support this. I also don't understand why Dacorum just says "yes" to the Government. This area needs to be protected from all of this housing plan. You are not in control of the infrastructure so cannot make claims you have The railway line is run by a franchise over which you have no control. The train service will collapse. We do not need more office space - have you not raed that office spare is lying empty in droves?</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS22
<b>Person ID</b>	1253669
<b>Full Name</b>	Amy Harman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS30
<b>Person ID</b>	1253801
<b>Full Name</b>	Moira Lea
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The AONB does not seem to be clearly defined in this map? Tring by size of existing buildings and population seems to have a large amount allocated to building land in the green belt. The view from the AONB would be affected. This is driven by developers not local need.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS34
<b>Person ID</b>	1253620
<b>Full Name</b>	John Howard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<b>policy SP1</b> From the plan of the area all I see is large swathes of green belt being churned up and forfeited to comply with your plan of 16.500 new homes. The area appears to be 4 times as large as the current houses existing in Dacorum. No indication of brown field sites. There is a Minuscule, almost non-visible employment growth area. There is no mention of competitive business rates to improve Decorum's economic growth. How can increased housing improve biodiversity, minimise waste and pollution, and mitigate and adapt to climate change.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS76
<b>Person ID</b>	224191
<b>Full Name</b>	mr david gardiner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	The pop up map does not denote site Tr-h6
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS102
<b>Person ID</b>	1254846
<b>Full Name</b>	James Martin
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	There is a lack of description of how building so extensively on the green belt will enhance biodiversity and whose responsibility it will be to ensure it. There is no mention of how the increased water run-off will be dealt with in berkhamsted, given the development is so weighted to one side of the valley.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS117
<b>Person ID</b>	1256432
<b>Full Name</b>	Rob Schafer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I do not see any convincing detail about how these are going to create strong communities - e.g. no references to co-housing or car free developments (e.g. modelled on continental developments such as Vauben in Freiburg, Germany), putting community facilities at the heart of the developments or describing a process to facilitate the social integration of new communities
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS122
<b>Person ID</b>	1145831
<b>Full Name</b>	Mr Nicholas Jones

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Preservation of the green belt is very important. Provision of social housing to rent at affordable prices should be a priority.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS135
<b>Person ID</b>	1142526
<b>Full Name</b>	Mrs Angela Goddard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable development surely means preserving some space and beauty for future generations as well as enough housing, and to build housing of a quality that will last and be pleasant environments to live in, not crammed together with little frontage or space around them.  The figures you are using - almost 1000 houses needed each year, are wrong, and the new government estimate it just over 300. You will have ruined the area based on the wrong calculations  Villages are a vital part of community and very much needed to prevent exclusion and loneliness. If you merge Northchurch into Berkhamsted and lose the village community all you will do is make a dormitory town for commuters. Your 'sustainable' development in Northchurch will provide a hellish place to move around in, and more danger from traffic for those future generations you are pretending to help.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS140
<b>Person ID</b>	1256506
<b>Full Name</b>	Dennis Matthews
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The draft plan was produced before two important developments:</p> <p>1. The verdict in the Inquest into the death of a young child, Ella Kissi-Debrah concluded that pollution from road traffic contributed to her death. When proposing new development, especially next to very busy main roads (in Dacorum, particularly the M1 and A41) which can only increase traffic, it will no longer be possible to say that we did not think that the people destined to live there would be at such risk. The plan recognises the importance of a healthy environment and recognises that traffic will increase but then proposes that new houses should be built next to the A41.</p> <p>2 The government is rethinking it's approach to development. Dacorum may not be required to provide so many homes. Once an area is identified in a plan for development, the chances of rowing back from this will be very slim. Much of what is proposed will fill many living in Tring and Berkhamsted and, I suspect, other places with great concern and will not be what they would wish to happen. Those who live in these areas have seen how much more busy they have become in recent years. The shear extent of the proposed development can only make this worse. Until it is known that all of the development will be mandatory, why not distinguish between, on the one hand, relatively modest development that would be acceptable to existing residents within the present commmunity envelopes and, on the other hand, the degree of development that would only be contemplated if we are left with no option? After all, the Council is there primarily to represent and act in the ineterests of those who live here.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS143
<b>Person ID</b>	1256692

<b>Full Name</b>	Cliff Slynn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS158
<b>Person ID</b>	868491
<b>Full Name</b>	Mr Graham Hoad
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	SP2 DBC to set out a strong framework to demonstrate the targets for needs in terms of infrastructure and facilities so that sustainable development proposals can be tested against the vision.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS169
<b>Person ID</b>	1257604
<b>Full Name</b>	Richard Hillier

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS191
<b>Person ID</b>	1257823
<b>Full Name</b>	Thomas Ritchie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The balance and timing of house provision and infrastructure has not been shown.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS201
<b>Person ID</b>	1257827
<b>Full Name</b>	Sheila Ashman
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Thank you for including sustainability. We are at a stage where we have to be doing more. Lots of little actions all help. Great re-cycling facilities in DBC. Thank you.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS231
<b>Person ID</b>	490644
<b>Full Name</b>	Mrs Helena Holliday
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Using Tring's Grade 2 agricultural land is not sustainable. <b>Over-development of Tring</b> I have commented elsewhere about the need to revise the plan as government policy changes to develop the north over the south of the country. I have also commented elsewhere about the need for <b>appropriate infrastructure</b> to accompany a 50% increase in population e.g. primary medical care, grocery shopping, town centre parking, the needs of Brook St, railway station parking, recycling facilities, and the need to preserve the Local History Museum building as part of <b>Tring's character</b> .
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS242
<b>Person ID</b>	1258731
<b>Full Name</b>	Tony Broadbent
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I believe the housing situation in the UK is a mess, with inadequate supply, profiteering and a complete disconnect between wages and prices. I think brown field development can only go so far, and controlled development on green belt will allow the necessary massive expansion in housing stock necessary to meet current and future demand. Green belt is not sacrosanct, between 1979 and 1993 it grew from 721k hectares to 1.6m hectares (wikipedia/economist). It is very difficult to analyse the proportion of land protected from development over time, due to the introduction of other designations such as AONBs, SSSIs and National Parks. Between them these now account for protecting approx 40% of area of England</p> <p>(<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856100/Green_Belt_Statistics_England_2018-19.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856100/Green_Belt_Statistics_England_2018-19.pdf</a>).</p> <p>I believe this is throttling the supply of housing. Land price now account for approx 75% of property values (25% being build costs), compared with 25% in 1957. Making more land available in areas of high demand in a controlled manner should gradually reduce shortages and reduce prices.</p> <p>I believe a legacy of Covid will be dislike of confined spaces, such as lifts, leading to a trend away from high density developments (tower blocks); a trend which I hope this plan can adapt to reflect.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS248
<b>Person ID</b>	1207707
<b>Full Name</b>	Mike Beavington
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS279
<b>Person ID</b>	1258939
<b>Full Name</b>	Ed Shedd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><b>Comments on Section 4.3 the SP1 Policy</b></p> <p>Reading the SP1 it is not clear how the weighting will be applied to each of the three roles - economic, social and environmental. On reading the documents in the Emerging Strategy, it feels as if they are not equal, with the economic and social roles having an outsize influence on decision making.</p> <p>One would expect to see decision making across all three roles driven by the principles of net environmental benefits, with significant increases e.g 25%-50% in biodiversity as a default, as well as applying the "polluter pays" principle. In a country which has some of the lowest biodiversity in the world, it feels a very low bar indeed to suggest that where environmental factors are taken into account, we are broadly looking to retain bio-diversity at the same levels of today. Which is what 10% increase implies. Perhaps I have misread and it is actually 100% increases in biodiversity we are looking for?</p> <p>This is important, especially, when we are branding the new developments in the Green Belt, the Hemel Garden Communities. If these are being built on green belt, most probably agricultural land?, which itself probably has very low levels of biodiversity because of the way in which it has been intensively farmed, it undermines the claim of these</p>

communities to be Garden Communities. In short, whilst the sustainable development policy feels genuine and well intentioned, if you were to place it on a spectrum of greenwashing to transformative environmental change, this feels much closer to the former than the latter.

We really believe that there is an opportunity to place environmental initiatives at the heart of our economic and social activity, not only driving a transformative change to the environment, but also creating a more prosperous, healthy region. There is a change to lead by example, and attract funding and investment accordingly.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS301
<b>Person ID</b>	1258240
<b>Full Name</b>	Adele Giles
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	These statements amount to little more than words. There is no detail to suggest how these points are actually going to be delivered. The supporting map is pretty poor guidance, using too many similar colours making it difficult to ascertain some of the areas. The level of detail is also lacking even in full-size view.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS319
<b>Person ID</b>	1259852
<b>Full Name</b>	Imogen Wagstaff
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	I am very concerned by the extremely high numbers of new housing proposed, much of which is proposed to be on greenbelt land. I am concerned that this volume of new housing will bring with it a significant increase in cars on the road, which is not sustainable environmentally and there is not the road infrastructure to support this. I am also concerned about the lack of provision for other infrastructure, such as water supply and waste water disposal within the plan. My other concern that in the current context of COVID, the economic repercussions of this will be felt significantly and there is a very great risk that as a result of the inevitable economic downturn we are entering into, there will not be people with the economic means to buy or move to these houses and greenbelt sites which are important to the natural ecosystems will be destroyed to build or half build houses which may then sit empty.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS350
<b>Person ID</b>	1259924
<b>Full Name</b>	Bassil Aslam
<b>Organisation Details</b>	
<b>Agent ID</b>	1259009
<b>Agent Name</b>	Bassil Aslam
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	Policy SP1 is Supported, and should allow a measured element of new Housing growth within villages such as Flamstead, via Policy SP1 b.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS362
<b>Person ID</b>	1260058

<b>Full Name</b>	Redbourn Parish Council
<b>Organisation Details</b>	
<b>Agent ID</b>	1260042
<b>Agent Name</b>	David Mitchell
<b>Agent Organisation</b>	Redbourn Parish Council
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The extensive use of the Greenbelt for development between Redbourn and Hemel Hempstead goes against the purposes of the Greenbelt as described in the NPPF. Specifically, the Hemel Garden Communities project will see urban sprawl into the Greenbelt and the narrowing of the gap between Redbourn and Hemel Hempstead. In addition, the extensive use of the Greenbelt will damage the local environment and ecology adding to the problems of climate change. On these issues, Redbourn Parish Council objects to the draft Dacorum Local Plan.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS403
<b>Person ID</b>	1260241
<b>Full Name</b>	BASSIL ASLAM
<b>Organisation Details</b>	
<b>Agent ID</b>	1259009
<b>Agent Name</b>	Bassil Aslam
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Policy SP1 is Supported, and should allow a measured element of new Housing growth within villages such as Flamstead, via Policy SP1 b.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS436
<b>Person ID</b>	1260485
<b>Full Name</b>	Nick Bowles
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Currently DBC are not meeting the requirements of sustainable living for its inhabitants. We know that each household in DBC uses more water than is sustainable. We know that the biodiversity of the area ia declining. it is impossible to add extra households and allt eextra people they will contain and still claim to be delivering on environmental targets which are already being missed with the current level of population density.</p> <p>on water usage from  <a href="https://www.thameswater.co.uk/about-us/newsroom/latest-news/2020/jul/reduced-abstraction-from-pann-mill-and-river-wye">https://www.thameswater.co.uk/about-us/newsroom/latest-news/2020/jul/reduced-abstraction-from-pann-mill-and-river-wye</a>  <i>In the Chilterns average daily water use is around 173 litres per person. This is 30 litres more than the national average and much higher than in countries like Germany, where residents use just 121 litres each, per day.</i>  <i>Andrew Tucker, water efficiency manager at Thames Water, said: “Every drop of water we all use comes from the environment so the less we use the more is left in rivers and the underground aquifers that feed them, to sustain wildlife. We’re working hard to reduce the amount of water we lose to leaks and reduced this by 15 per cent last year, but while we continue to do our bit to leave more in the ground to support chalk streams, we also need everyone to use a bit less. <b>It’s vital that at a time when we’re seeing the impacts of climate change and more people move into our area, there’s enough water for everyone.</b></i></p> <p>Where in this document is there any hint of exactly how DBC will reduce current water usage and move forward to reduce water usage in future?</p> <p>The Government's own assessment of the current state of biodiversity and of pollution agrees that it has missed all its targets  <a href="https://jncc.gov.uk/our-work/united-kingdom-s-6th-national-report-to-the-convention-on-biological-diversity/">https://jncc.gov.uk/our-work/united-kingdom-s-6th-national-report-to-the-convention-on-biological-diversity/</a>  In addition, the report identifies other areas where there is significant work to be done:</p>

- There is an overall picture of ongoing species decline, although perhaps not at the rate seen in previous decades. There are some species or species groups where there has been progress and there have been a number of promising reintroduction schemes.
- Despite some progress in improving the condition of protected sites, a significant proportion of the best wildlife habitats inside and outside protected sites remains unfavourable.
- There are ongoing pressures on biodiversity. For example, despite good work to identify introduction pathways and rapid and early response to some detections such as Asian hornet, the prevalence of invasive species continues to increase across the UK.
- There has been a short-term fall in Government funding for biodiversity in the UK, although as biodiversity has increasingly been integrated into other funding streams such as green growth, the data has become increasingly difficult to assess.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS448

**Person ID** 1260507

**Full Name** Michael Burbidge

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Sustainable Development in Dacorum**

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS465

**Person ID** 1260616

**Full Name** Oliver Burrough

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	in para 4.2, who defines what economic, environmental, and social "progress" is? Will this be set out in Local Plan? Or is it under continual review, open to democratic decision making?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS501
<b>Person ID</b>	1260803
<b>Full Name</b>	Rollo Prendergast
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS543
<b>Person ID</b>	1253627
<b>Full Name</b>	Debbi James-Saunders
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>I object to the proposed development at Rectory Farm which is on precious Green Belt Land in Kings Langley. If Covid-19 and lockdown has taught us anything, it's how important our green spaces are in the village to help with our physical and mental health.</p> <p>Having read the Green Belt section of the National Planning Framework, I understand that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open, so openness and permanence are key. Building on Rectory Farm does not meet the exceptions required to justify building on our Green Belt. I do not understand what has changed since the last local plan in 2002 and the objections that the Planning Inspector had to developing Rectory Farm at that time. I believe that councils should be concentrating on using brown field's site and ensuring that the brown fields register is kept up-to-date.</p> <p>I do support providing good quality affordable housing, but not at the expense of our open spaces. Around 3,500 homes have been accommodated in Kings Langley and the surrounding area since the last Local Plan. I would like to see the Rectory Farm land used for recreation. If this land was identified as a strategic open space, a green wildlife corridor along the canal and River Gade could be created.</p> <p>I do support providing good quality affordable housing, but not at the expense of our open spaces. The additional 145 homes planned will bring extra traffic onto an already busy main road, bringing further noise and air pollution to the area. With a 40mph speed, it is likely that there will be more accidents as cars try to pull into the fast main road. Before that, the site traffic will bring their own problems to our village.</p> <p>The additional homes will put extra pressure on the infrastructure of the village, particularly on our school and medical care.</p> <p>I hope that all of my points will be considered and we can retain our Green Belt.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS551
<b>Person ID</b>	1260936
<b>Full Name</b>	Peter Hadden
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I believe the overall number of new homes required is significantly over-stated and does not reflect central government's plans for the geographic "levelling up" of the economy. Nor does it reflect the impact of large numbers of EU citizens who were resident in Britain leaving in the light of Brexit.</p> <p>I believe that the Dacorum Plan should be based on the most recent ONS figures from 2018 which suggest a housing target for Dacorum of around 500 houses per annum half the figure in the Dacorum Plan and which would significantly reduce the need to build on Green Belt.</p> <p>I understand that DBC have challenged the total housebuilding figure provided by central government and if this challenge is successful then much of the Plan will need to be torn-up and thousands of hours of work will have been wasted. In the meantime areas of Green Belt may be unnecessarily de-classified never to return to their previous status.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS568
<b>Person ID</b>	1261023
<b>Full Name</b>	Richard Brash
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The driver for growth envisaged in the plan is the requirement to provide more housing. It is assumed that with more people there will be more employment. This does not necessarily follow. In fact the driver for growth is more likely to be employment-led not the arbitrary decision to build more houses.

Employment patterns are bound to change following the pandemic and the demonstration that remote working for at least part of the time is feasible and desirable. The consequence of this is likely to be that if people can work remotely they will not need to live in expensive areas near to London and may move to cheaper areas. Hence the demand for extra housing may not materialise or may not do so to the extent envisaged.

If population growth is not as great as envisaged it follows that the demand for retail space will not be so great. This coupled with the acceleration of the trend to online shopping may lead to a reduction of demand for retail space.

The pandemic will lead to changes we cannot envisage. The most sustainable development for the foreseeable future will be based on flexibility and the adaptation of the current building stock, particularly current retail and office premises, to residential.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS584

**Person ID** 1260922

**Full Name** colin Lillicrap

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**Sustainable Development in Dacorum** Cramming ever more people into the south east will perpetuate the current inequalities that exist across the UK. The level of new build proposed for towns like Berkhamsted and Tring will seriously damage those towns while doing nothing to improve living conditions and job opportunities in poorer parts of the country. The level of damage this plan would cause is contrary to the declared economic, social and environmental roles.

The population of Berkhamsted has grown rapidly in recent years but there has been little investment in new infrastructure. Already roads are very congested and in places dangerous. Pollution levels are already high in parts of the town. The proposed development is not sustainable contrary to the claims made in the plan.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS591

<b>Person ID</b>	1261122
<b>Full Name</b>	Mark Slade
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Please just give us enough notice of when your going to do this so we can move away.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS599
<b>Person ID</b>	1142426
<b>Full Name</b>	Mr Phil Porter
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Given that there will be 65% increase in over 65s there appears to be no coherent strategies to entice the over 65s from their 4/5/6 bedroom houses , thus freeing these up fir families and thus limiting new build requirement . I would suggest good quality 3 bedroom houses / bungalows within walking distance of centres .</p> <p>Also strategy should demand that ALL new homes have electric car home charging points .</p> <p>There also appears no response to the government requirements to provide land for Self Builders .Done properly this would enhance the county housing stock as well as giving individuals an incentive to invest in their housing stock.</p>

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS620
<b>Person ID</b>	1261183
<b>Full Name</b>	Oliver Fairfull
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<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</p>

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.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS685
<b>Person ID</b>	1249904
<b>Full Name</b>	Mrs Christine Ridley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

**Sustainable Development in Dacorum** Here again, I would not quibble with the aims set out in this section of draft plan, but the actual plans for development do not live up to these aspirations.

**4.2** Although I agree with the aim of  
*‘Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites’*,

I do not consider that DBC is managing to fulfil this aim by planning to build most of the new dwellings on Green Belt land and proposing to totally ruin an existing beauty spot by building all over one side of the Gade valley as part of the Garden Community project to the north of Hemel, and also impacting ancient woodland.

**This cannot be acceptable, and certainly does not match the aims of the plan.**

The text goes on with the assurance:

**4.3** *‘Achieving these roles is a central focus of the Dacorum Local Plan to 2038’.*

**..... DBC has ‘an environmental role – ‘contributing to protecting and enhancing the natural, historic and built environment, and as part of this, helping to improve biodiversity’**

*But the ancient settlement of Piccotts End and Water End, and Winkwell are bound to be directly and adversely affected by these new estates, due to their proximity to the new buildings, and the biodiversity of the farmland and with its farmland bird population including Skylarks, Linnets, Yellowhammers, and winter visitors such as Redwing and Fieldfare etc., all of which are on the RSPB Red List, will be directly affected by the proposed development.*

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS703
<b>Person ID</b>	1261251
<b>Full Name</b>	Lesley Ashden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	My commnets above also relate to this point. There has been significant deveolpment of housing in the last 3 years in the area, and many previous commercial sites have been replaced by housing. In Berkhamsted this has resulted in

congestion on the roads, as a steep sided valley town there is only one through route. In addition the infrastucture has not been uopgraded except for the additional parking in the station and the new multi storey car park in Lower Kings Road this year. Welcome as this is, people have not fared so well with no additinal schools or doctor's surgeries.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS722

**Person ID** 1261250

**Full Name** Christina Thompson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** I do not believe that Dacorum's proposals support the Planning system environmental role because of the extent of the destruction of green belt and agricultural land proposed.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS782

**Person ID** 1261297

**Full Name** Matthew Buchanan

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS788
<b>Person ID</b>	1260046
<b>Full Name</b>	Jude Jackson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I do not believe this plan is sustainable in any way. You are proposing a huge increase in housing and therefore the demands on our local environment (loss of green spaces) huge increase in need for water and sewerage treatment. It will irreversibly change the nature of the town. I have seen what has happened in other parts of the country to places such as Bicester, Buckingham, Thame where development has caused loss of local community and identity.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS867
<b>Person ID</b>	1143779
<b>Full Name</b>	Ms Julia Marshall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

* No	
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS888
<b>Person ID</b>	488516
<b>Full Name</b>	mr hugh siegle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The three core roles of the planning system are described. . It is proposed to release a considerable amount of Green Belt ( 850 hectares) for residential development. This is in direct conflict with the Environmental Role of planning. Such a scale of development scattered around the Borough in a number of environmentally sensitive locations cannot be described as sustainable and the planning system in Dacorum is therefore failing in its performance of this role.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS904
<b>Person ID</b>	926372
<b>Full Name</b>	Mr Michael Nidd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	The greatly-increased “demand” for housing is heavily influenced by Herts County Council, other consortia of local authorities and unelected bodies such as Herts Enterprise Partnership, which persuaded Dacorum to declare itself in favour of “accelerated growth. This Local Plan therefore has far more of the characteristics of the late and unlamented Regional Plans and few that relate to the Dacorum locality itself. The “demand” is greatly in excess of that which would meet housing needs for Dacorum's residents. It is so far in excess of what is justified that the Leader of the Council, on behalf of all the elected Councillors, has in effect disavowed the elected Council members from support for the core element of the draft Plan. The numbers, which are the driver of the plan, are based on both the “mutant algorithm”, which inappropriately concentrates development in the south-east, and also on outdated numbers from ONS 2014 census information, If the numbers were calculated on the basis of the 2018 census data the numbers would be reduced by 53% and would make it unnecessary for any predation on green spaces.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS920
<b>Person ID</b>	1261172
<b>Full Name</b>	Barry Morris
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Why are you proposing to build on GREEN BELT LAND IN BOVINGDON. This is totally against the Governments agenda for a Greener Britain!
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1117
<b>Person ID</b>	1143022
<b>Full Name</b>	Mrs Lin Phillips

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I dispute your assumption that such a scale of housing development could be achieved without ruining the character and quality of life in the market towns of Berkhamsted and Tring. The green spaces around these towns are its lungs and contribute to good air quality as well as to the wellbeing of their residents. To build on such vast areas could not possibly not impact upon these towns, adding to pressures on their infrastructure.</p> <p>You envisage a growth in retail space, including in Hemel. But since the massive evacuation of high street shops everywhere, this just doesn't make sense. A post covid review of the empty space, both office and retail, in the town centres would surely highlight opportunities to develop sustainable mixed developments, and for residents of new housing in the centres, fewer car and bus journeys would be required, easing pressures on available transport links and traffic. Any existing pockets of green space in and between towns should be carefully guarded for the future. The future citizens of our Dacorum will not thank you for implementing your plan.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1145
<b>Person ID</b>	1261803
<b>Full Name</b>	Mr William Duling
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Sustainable Development in Dacorum</b>	I dislike it and its encroachment on our town of Tring, in specific development in the areas of Tr01, Tr02, Tr03 and Tr06. I have gone into detail about this in Q5.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1153
<b>Person ID</b>	1261809
<b>Full Name</b>	Pam Ferguson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Sustainable development requires new infrastructure to support the new housing developments . In Berkhamsted the plan identifies potential sites for new schools at both secondary and primary level which is welcome .(Although future education provision is still being considered by the county council .) I can see very little evidence of any additional employment opportunities in Berkhamsted or of additional health services .The provision of in excess of 2200 homes in Berkhamsted is not accompanied by any improvement in transport other than the provision of walkways and cycle ways . It is acknowledged throughout the local plan that the steep hills in Berkhamsted deter walking and the use of cycles and that the majority of trips, even short journeys , will still be made by car .The roads in Berkhamsted are already congested . Many roads from the southern side of the town to the high street are already used as ratruns making them dangerous for walking .Parking on pavements is a problem in the town again hindering walking to town .The vast majority of development in Berkhamsted is on the outskirts of the town and will lead to many more car journeys . There is currently a very limited bus services in Berkhamsted and train services , in normal times, are seriously overcrowded in the rush hour .</p> <p>The council states that housing needs to be located in places with excellent access to jobs ,shops and services and can quickly be reached by sustainable public transport and benefit from high quality walking and cycling infrastructure. I do not think the provision of the housing in Berkhamsted meets this objective.</p> <p>The vast majority of the housing in Berkhamsted (and in Dacorum ) is on green belt land . The new government white paper states that development on green belt should only be in exceptional circumstances . The green belt in the south of Berkhamsted is a buffer between the A41 and housing in the town . This green lung will be lost under the current plans .I cannot see how the loss of all this green belt in Berkhamsted can lead to a net gain in biodiversity.The provision of</p>

a small park at the bottom of Durrants Lane and small green spaces on the development sites will not ease the pressure from the massive growth of Berkhamsted on the surrounding National Trust land .

The water in Berkhamsted is sourced aquifers . Is the future water supply sustainable? There is no evidence for this .

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS1159

**Person ID** 1261837

**Full Name** Kimberley Bond

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** The idea of any growth on the scale you are proposing as contributing to sustainability is laughable. The housing growth you propose continues to damage green open spaces and further reduce the space between towns and villages. Even over the timeframe you propose, growth on this scale, in this region, can only produce additional pollution through increased traffic and noise.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS1166

**Person ID** 1261840

**Full Name** Rachel Heath

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	I would like to see clearer evidence of sustainable development which is also respectful of the the environment for the future and for individuals. Building on the valley ridges away from the town centres will encourage more cars (buses on country lanes in Berkhamsted are tricky to negotiate and few in number) and not be ideal for inclusive dwellings as well as being too far from social facilities. With Covid changing the way we live our lives please look forward in the near future to the changes in lifestyle and the eco credentials of the new buildings.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1186
<b>Person ID</b>	1257489
<b>Full Name</b>	louis quail
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><i>The Un-secretary-general said in 2020 making peace with nature is the defining task of the 21st century</i></p> <p>Pointing out the dire current environmental and climate trends, he said: “humanity is waging war on nature,” and that nature was already “striking back with growing force and fury.” Consequently, he said that “making peace with nature is the defining task of the 21st century. It must be the top, top priority for everyone, everywhere.”</p> <p>I believe Housing development must be holistic and consider societies need’s now and in the long term future.</p> <p>Current development plans as presented in the Dacorum Council Local Plan and as shown through government policy are archaic, short sited and extremely narrow in scope. They prioritise developers and political objectives against those with actual housing need, reflecting an ideological obsession with the free market and prejudice against government intervention. Worst of all they do not value in any meaningful way the intrinsic value of green belt land and our need to respect nature.</p> <p><b>Any Local Housing plan In Dacorum (and beyond) must consider ethically and legally the following points :</b></p>

The starting principal should be that the countryside belongs to every one as we all have a stake through: bio diversity; open space vital for wellbeing and amenity and food security ( 80% of our food is imported )

Building on Greenbelt is currently and should always be a last resort. Although there are some rare times when wider society deems it ok this should be done only in carefully controlled and genuinely democratically consulted situations. Steps should be taken to get rid of the culture of developer/landowner land and profit grab. For example government could set the price of virgin land to fight back against uncontrolled and corrupt developments .

Releasing housing pressure on the South East by pushing for economic development of the north is a win win situation .

More publically built social housing is required and more affordable housing which should be genuinely affordable not discounted ( 20 % off a million pounds does not make an affordable house. This should include housing for specific and vital groups like emergency workers .

Stopping Urban sprawl is essential for our nations well being

This assault on green spaces is coming from a place of centralized government , not local democracy . Already councils and developers don't listen to residents' objections. We need a more democratic planning system not less. Recent government plans to weaken local council planning is a a further assault on local democracy . Councils should and must fight back against centralised government.

Demand for housing is being used as a tool to strip local democratic powers and profit Tory party developer donors .

Sustainable Carbon 0 housing should be an absolute requirement not a marketing policy .

Recognize that building on greenbelt runs directly against governments plans to be Carbon zero by 2050 .

Building a few bat boxes is not enough to protect bio diversity when you are concreting over many acres of fields.

Bring empty homes back into use and Consider how government intervention be used to increase the efficiency of housing . Building large homes for wealthy divorcees on Green belt land might be good for ones political base but will not solve the housing crisis .

Planning for housing development should prioritise housing need not profit.

All developments need to be more efficient in their use of space ,

Architects should be encouraged and incentivized to develop efficient housing developments on brownfield spaces; As opposed to Wimpey box style developments on Green belt.

Ecological, sustainable and aesthetic principals must be considered in all Housing development and prioritised over profit.

**Included files**

[\\_U0A6811.jpg](#)

**Title**

Sustainable Development in Dacorum

**ID**

EGS1201

<b>Person ID</b>	1261875
<b>Full Name</b>	Fiona Silver
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I see no evidence that this plan is " <i>contributing to protecting and enhancing the natural, historic and built environment, and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change.</i> " In fact by building on green belt land to meet a a new housing target that is clearly not in fact a target, it does precisely the opposite.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1229
<b>Person ID</b>	1259116
<b>Full Name</b>	Tring in Transition (TinT)
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<b>Policy SP1 ‘Sustainable Development in Dacorum’, section 4.2 and 4.3 (Page 28)</b> <ul style="list-style-type: none"> <li>Of the three key areas –<i>‘economic, social and environment’</i>– the latter is the least well defined in the Plan. We have a concern that specific targets from the Herts Sustainability Strategy and HCCSP priorities are not explicitly reflected in general or that a robust enough approach is being taken on building standards or energy efficiency. There should be reference to, for example, stringent building regulations, requiring orientation of housing to allow</li> </ul>

for thermal solar and solar PV installations as part of all new builds, alongside ground and/or air source heat pump electricity generation, but these are not apparent anywhere in the Plan.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS1254

**Person ID** 1253932

**Full Name** Gareth Scrivens

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** The content in these sections do not make it clear how any of these 'Sustainable roles' will be realised and governed. There is no evidence provided in this section. The diagram serves to illustrate more clearly how much GreenBelt land will be built on as part of this vision.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS1261

**Person ID** 1261930

**Full Name** Chris Gee

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1266
<b>Person ID</b>	1253872
<b>Full Name</b>	Georgia Huelamo
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Building this quantity of housing over a very condensed 18 year period, does not reflect true sustainable development in line with economic, social and environmental considerations. Tring will increase by 55%. This is not about meeting the needs of housing for people. It is meeting the needs of developers profits by using greenbelt land.</p> <p>This amount of housing in such a short period of time, compromises and restricts the ability of future generations to progress economically, socially and environmentally .</p> <p>In the proposed planned use of greenbelt land to develop housing, future generations will lose a precious resource and may be restricted in how they manage their own economic, climate and societal changes.</p> <p>Consideration of an increase in proper infrastructure and the growth of employment opportunities should come first, before unwarranted large scale house building.</p> <p>The plans for the proposed housing numbers, do not represent economic, social nor environmental sustainability.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1274
<b>Person ID</b>	1145427
<b>Full Name</b>	Mr David Glenister

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	There seems to be a conflict between the out of proportion growth targets outlined in this plan and environmental role of the DBC planning system in protecting and enhancing the natural, historic and built environment of the Borough. As highlighted in my comments on section 3, 'the visions and strategic outcomes' referred to in Policy SP1 are not in line with Dacorum's Green Sustainable Land Management for Environmental Protection, while the 'proposals and sites' included in the Plan are fundamentally not "sustainable" sites. Readers of paragraphs 19.6 and 19.7 in the 'Managing Development in the Countryside' section are referred to this section for the 'justification' of the Green Belt boundary changes but it is not possible to read anything in paragraphs 4.1, 4.2, 4.3 or Policy SP1 that could remotely be described as "fully evidenced and justified" as required by the NPPF. Therefore Sustainable Development cannot possibly be considered to satisfy the the environmental role of "contributing to protecting and enhancing the natural, historic and built environment, and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change."
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1322
<b>Person ID</b>	1145350
<b>Full Name</b>	Mr Edward Murray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	I support sustainable development that is aligned to the new world, not something from 10 years ago,
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1446
<b>Person ID</b>	1262084
<b>Full Name</b>	MISS PAULA HASTINGS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"> <li>Dacorum to implement a local plan that includes firm and ambitious sustainable commitments. An example of this is that, Every property has a parking space to have an electric vehicle charger built into</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1466
<b>Person ID</b>	1262092
<b>Full Name</b>	Elly Haezewindt
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	I believe that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. 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 st
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1490
<b>Person ID</b>	1262216
<b>Full Name</b>	George Godar
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	We are concerned about the interaction between housing, employment and commercial activities having regard to the effect of the pandemic on overall plans. It is likely that remote working will become more prevalent and there will be less need for London workers to live in Hertfordshire, including Dacorum. This reduced demand for housing can be met by the use of brownfield sites rather than on Green Belt land, particularly if there is also a reduced demand for local office and retail space following the pandemic which would allow this space to be converted to residential housing.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1625
<b>Person ID</b>	1262236

<b>Full Name</b>	Kevin Tozer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>. In relation to policy SP1, all the developments in the sustainable development of Dacorum must contribute to play an economic, social and environmental role. On reading the proposal, it is very evident the only real reason for the proposed developments is to provide additional Housing. In relation to the proposed developments in Tring, this is at the expense of the environment (Green Belt, and areas of agriculture being built upon) and social, (where a reportedly increase of over 50% of the current population as a result of the developments) would put a strain on all infrastructure and services..</p> <p>With the proposed strategy and developments being produced prior to the Governments levelling up agenda and the changes in working norms as a result of the pandemic, there is a need to re assess whether these developments are still required for the future.</p> <p>It would be a disaster of epic proportions to make the proposed irreversible changes to the Greenbelt and countryside within Dacorum only to find the demand for Housing in these areas is no longer required.</p> <p>The responsible and reasonable decision is to not approve the proposal but to pause, re-assess and review the needs of Dacorum once the impact of the Government's new policies, Brexit, and the society working norm changes as a result of the pandemic as known.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1628
<b>Person ID</b>	1262323
<b>Full Name</b>	Emma Hilder
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1692
<b>Person ID</b>	1165136
<b>Full Name</b>	Mr & Mrs J.D Battye
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>This plan is premature, does not address the fundamental priority of adequate infrastructure to match the accumulation of developments (not just the impact of an individual one v.DM60), is unrealistic in its transport aspirations, is in places illogically formulated and contravenes official Green Belt policy . An increase in affordable homes at the expense of the environment, biodiversity and amenity in areas of low affordability will result in a levelling-down, not up, as the Government intends. It neglects the reasons why affordability is low in such areas. i.e. that house prices in places considered the most amenable are determined by market forces. Consequently where demand is at its highest affordability is at its lowest.</p> <p>If growth is to be fostered policy should be directed to less prosperous parts of the country. Rather than destroying Green Belt land and further burdening an already deficient infrastructure, any growth in Dacorum should be created by improving productivity, providing and maintaining adequate infrastructure, particularly in the fields of education and healthcare ,reducing red tape and bureaucracy, improving electronic communications, embracing technological advances and discouraging public sector waste and inefficiency.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1698

<b>Person ID</b>	741178
<b>Full Name</b>	Mrs Jenny Jenkins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I am writing with concerns about Dacorum's proposed Local Plan, titled "Emerging Strategy for Growth 2020-2038".</p> <p>I am broadly in agreement with the CPRE Herts views on the proposal, an in particular on these aspects:</p> <ul style="list-style-type: none"> <li>• <b>The impact on the Green Belt and ANOB</b> - I think that delivering 100% of the self-assessed housing need will have a significant impact on these areas around Dacorum</li> <li>• <b>Overprovision of new housing</b> - I agree and understand there is a need for more housing, particularly affordable housing, but I don't agree with the scale of the proposed development. The much criticised government algorithm should not be used, the latest ONS projections should be considered as the most relevant data. Projections should include an assessment of impact of the pandemic on working/living/business location patterns. The Plan should be making use of the recently expanded permitted development rights, both of which create many more opportunities for conversion of commercial space (especially office and retail) to housing. And why, now that the St Albans Submission Local Plan has been withdrawn from Examination, should the Plan still see the proposed sites north of Hemel Hempstead (5,500dw) in Dacorum as still being sound?</li> <li>• <b>Climate emergency</b> - why is economic growth still prioritised over climate change in this plan? These plans should include detailed evidence-based carbon budgets and committed targets of local carbon reductions and effectively show how these carbon budgets will be regularly and effectively monitored. 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. Why is there evidence in the Plan of such an approach?</li> <li>• <b>Impact on infrastructure, including water supply</b> - I'm particularly concerned about the burden on infrastructure services and facilities in Dacorum - especially on water supply and waste water disposal. I understand from the CPRE Herts that 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 situations more water would be extracted from the chalk aquifer, affecting our chalk streams which I think are very precious. New supplies of water, and improvements to transport and treat wastewater and sewage will last 10 years and be very expensive - how does this Plan take the cost/disruption/timescale and chalk stream protection into consideration?</li> </ul>
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1734
<b>Person ID</b>	1153984
<b>Full Name</b>	Elizabeth Rennie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Section 4.</p> <p>As stated in Section 3 removal of Green Belt designation and the building of houses on such Green Belt is not environmentally sustainable.</p> <p>In summery these plans go against the Government's policy regarding development in the Green Belt and are environmentally unsustainable . They will change the nature of two country towns in the borough namely Berkhamsted and Tring for ever.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1775
<b>Person ID</b>	1154047
<b>Full Name</b>	Brendon Sparks
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

<p>* <b>No</b></p> <p><b>Sustainable Development in Dacorum</b></p>	<ul style="list-style-type: none"> <li>Your proposal indicates nearly 11,000 homes (10,954) to be built in urban areas. This leaves virtually 6,000 (5,954) homes to be built in “green field” areas. The Council is ignoring the concept of the Green Belt – most of which is around Tring and Berkhamsted, altering the fabric and features of these towns as well as their countryside amenities.</li> <li>The Council is ignoring the national Planning Policy contained in the NPPF – including statements by Ministers and the Prime Minister that Green Belt should not be developed except in ‘exceptional circumstances’. The Council proposal makes does not clearly state what the exceptional circumstances are for the Borough. The Council’s proposals are not justifiable nor are they sustainable and this is the core of opposition to this draft Plan. The Council should revert to the Core Strategy vision statement. It clearly is difficult to understand the Councils deviation from what it previously espoused!</li> <li>Nothing in the ‘Sustainable Development in Dacorum’ section can be described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The Council has totally ignored this. The growth proposed is neither sustainable nor respecting the environmental role of planning.</li> </ul>
<p><b>Included files</b></p>	
<p><b>Title</b></p>	<p>Sustainable Development in Dacorum</p>
<p><b>ID</b></p>	<p>EGS1802</p>
<p><b>Person ID</b></p>	<p>1262358</p>
<p><b>Full Name</b></p>	<p>Jennifer Scott</p>
<p><b>Organisation Details</b></p>	
<p><b>Agent ID</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Agent Organisation</b></p>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>The principles of sustainable development are understood, however there is a fundamental flaw on the basis of the growth targets outlined in this plan and the environmental role of the planning system in protecting and enhancing the natural, historic and built environment of the Borough.</p> <p>As highlighted in BRAG's comments on section 3, 'the visions and strategic outcomes' referred to in Policy SP1 are fundamentally flawed, while the 'proposals and sites' included in the Plan are fundamentally not "sustainable" sites.</p> <p>Readers of paragraphs 19.6 and 19.7 in the 'Managing Development in the Countryside' section are referred to this section for the 'justification' of the Green Belt boundary changes but BRAG fails see anything in paragraphs 4.1, 4.2, 4.3 or Policy SP1 that could remotely be described as "fully evidenced and justified" as required by the NPPF.</p> <p>On this basis the Plan fails the sustainability test</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1830
<b>Person ID</b>	1262448
<b>Full Name</b>	Nigel Ormiston
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	I would find it helpful if you could at least acknowledge that building on this scale is bound to be to the detriment of the area in various ways, even though your hard work and expertise may mitigate this. I would have liked some explanation as to why there can be no debate around the current government targets.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS1881
<b>Person ID</b>	1261830
<b>Full Name</b>	alistair budd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Just building houses does not of itself build strong ,vibrant communities . For example most of the site proposals for Berkhamsted are just estates built on greenbuild land with poor access to local services with nothing that builds a community identitify and worse than that erodes futher thae nature and charater of the town .</p> <p>As for environment where are the proposals to ensure that site plans include a substatial replanting of farmland greenbelt sites with woodland and wild areas . Look to the Garden cities for your inspration and how their 'greenness ' makes them such desirable places to live decades after they were conceived .</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1891
<b>Person ID</b>	1262291
<b>Full Name</b>	Paula Farnham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<p>How is 'supporting strong, vibrant and healthy communities' addressed by 'providing housing'? All the plans indicate the additional housing will compromise air quality, increase congestion, reduce access to green space, and for these reasons reduces the strength and vibrancy of the communities you seek to support.</p> <p>The plan doesn't mention how the existing developments support delivery of more sustainable life in the borough. Adding on new sustainably built housing isn't building a sustainable life.</p> <p>Planning should not be rushed because a development is set out in the plan. This allows for quick and hasty development that contradicts many of the stated aims.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1906
<b>Person ID</b>	1262553
<b>Full Name</b>	Henry Wallis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<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 &amp; 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>There are many laudable plans set out to be met in building new houses (linked to climate change and "green"). However, what measures are there to <b>ensure</b> that these are adhered to in the plans submitted by developers. We have heard</p>

such words in previous plans/master plans and these have not been followed through to the plans that were actually approved by DMC.  
 Several of the "green" elements are based on draft documents so it is difficult to assess/comment properly until these are finalised.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS1947

**Person ID** 1262255

**Full Name** AJ W

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum** The sites outlined in the documents for Berkhamsted are NOT sustainable and nowhere within the section for 'justification' is there anything convincing that would cover the 'fully evidenced and justified' changes to greenbelt as required by the NPPF. Thus the plans for Berkhamsted & Tring do not pass the sustainability test.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS1955

**Person ID** 1262618

**Full Name** Jasmine Jenkins

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	How will this plan be protecting and enhancing the natural, historical and built environment, improving biodiversity and mitigating and adapting to climate change? How will Dacorum ensure that this happens? We have all seen promises like this not kept in the long term by builders of housing
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS1960
<b>Person ID</b>	1262601
<b>Full Name</b>	Anne Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	The three roles economic, social and environmental need to be embraced but the former two must not be given precedent over the third, the environment. By eating into the Green Belt around the towns and villages such as Northchurch, there is a significantly negative on biodiversity.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2014
<b>Person ID</b>	1262719
<b>Full Name</b>	Richard Lythaby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Downgrading of Hemel Hempstead A&amp;E to urgent care meaning the nearest A&amp;E's are Luton or Watford, large centres themselves.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2040
<b>Person ID</b>	1262604
<b>Full Name</b>	Ray Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	4.2 The plan appears to hold the present hostage to future benefits without guaranteeing that they will materialise.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2047
<b>Person ID</b>	1262738
<b>Full Name</b>	Alan Pierce
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2081
<b>Person ID</b>	1262755
<b>Full Name</b>	Karen Johnson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum. As far as I can see the plans for where I live in Berkhamsted will damage the historic town with overdevelopment. Whilst we may sit in an area of outstanding beauty there is virtually no green space of any size for the residents to use that is walking distance in the town (it's all been built on over the years) and cars are needed to get to Ashridge. The developments over one side of the town are removing a large band of wood and foot paths through green belt and would mean there is no sizeable green natural area that side of the town and take housing right up to to the A41. This area is used extensively by walkers and horse riders (the numbers of dog owners has grown massively in the town) and gives protection to the town from the pollution, noise of the A41. Building more houses eats up what little green space we have left, brings more traffic to our already congested roads, more pollution and pressure on other already buckling services and facilities. There is no space to build cycle lanes as a vast majority of the roads are narrow already lined with cottages and have no grass verges. Northchurch end of the town already can't cope with the sewage demands of the town and I know people who have toilets backing up and the sewage people have told them there is nothing they can do there is too much pressure. Nothing in this section can be remotely described as "fully evidenced and justified" as required by NPPF to remove green belt designations. The growth proposal is neither sustainable nor respecting the environmental role of planning.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2098
<b>Person ID</b>	1262762
<b>Full Name</b>	Eric Dodman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	I am struggling to see how an extra 2700 houses, mostly being built in two very large "wet" fields, between Station Road and Bulbourne Road, will maintain, support or allow wild life and their habitats to flourish. It will certainly reduce the positive effects of the natural environment for the people who live here.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2157
<b>Person ID</b>	1262765
<b>Full Name</b>	Paul Rees
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	This strategy assumes far too much building of new homes, and far more too much destruction of the local environment. The number of new homes should be halved and new homes should be built only on brown field sites, in large built up areas already. Villages such as the historic Kings Langley - which was the capital of England in the late 1340s - should be protected against future development (which entails the destruction of the local environment) and cherished as low density settlements, with open spaces, and a close connectivity between man and nature.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2192
<b>Person ID</b>	1262841
<b>Full Name</b>	Nada Ryan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	There is nothing written in this section that is "fully evidenced and justified" as required by the NPPF to remove Green Belt designations. The growth proposed is neither respecting the environmental role of planning nor sustainable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2218
<b>Person ID</b>	1262860
<b>Full Name</b>	Susanne Rees
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The scale of development envisaged in this plan is not sustainable. Therefore, given that Dacorum says it wants to promote sustainability and protect biodiversity, and promote healthy communities, it should halve the number of homes that it is assumed will be built during the period of this plan. All villages in the green belt (including Kings Langley) should be protected, otherwise their character will be changed forever. It should not be forgotten that Kings Langley is an historic village that was the capital of England in the late 1340s and needs to be protected and cherished; and its character as a village must be preserved.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2244
<b>Person ID</b>	1258646
<b>Full Name</b>	Jane Timmis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><b>Sustainable development</b></p> <p><b>An economic role</b> - excessive housing 'communities' do not equal economic sustainability. It is not sustainable to build on Green Belt Land, nor to build on the outskirts of existing settlements, when there is no defined infrastructure described to support it. As it stands the major building sites in Berkhamsted and Tring or indeed the villages are not sustainable in terms of supporting a strong economy, when there are few sites identified for new businesses to thrive.</p> <p><b>Social role</b>, introducing an overwhelming increase of up to 50% more people into developments on the outskirts of existing market towns or villages will create separate communities.</p> <p><b>An environmental role</b> - building on Green Belt will not enhance the countryside as claimed. There are no concrete plans to deliver climate change. The Green Belt is supposed to be protected, so building on it will not protect it environmentally.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2248
<b>Person ID</b>	1262731
<b>Full Name</b>	Julie Battersby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><b>SP1 (1)</b>. There are a significant number of policies in the NPPF relevant to the application that protect assets that are already known to exist in the Dacorum area that will be adversely impacted upon if the Council grant permission to approve the Local Plan as it stands based on the scale of currently proposed development.</p> <p>Critically, the council will be in breach of policy listed under NPPF paragraph 174 to “safeguard components of local wild-life rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated</p>

sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. This applies to housing development that will, for example, adversely impact on Dacorum’s Chalk Rivers and all sites listed as Value 1 and 2 under Hertfordshire Ecological Network Dataset provided by the Hertfordshire Environmental Records Centre. Value 1 habitat qualifies for protection under S41 of the Natural Environment and Rural Communities Act, whilst guidance provided by the Hertfordshire Local Nature Partnership is that all Value 2 sites should be protected {by the Local Plan} and considered for habitat restoration and enhancement. Value 1 and 2 sites include BK06 and BK07.

Furthermore, all too often mitigation to ‘provide net gains for diversity’ is held up as the acceptable compensating factor on which the concept of Sustainable Development is carried. This is missing the point of the environmental safeguards incorporated into the NPPF. Far too little emphasis is placed on **minimising impact** (para 170d) on existing specialist habitat biodiversity which often may include preserving the existing habitat for species prioritised under current local biodiversity plans, such as the Skylark. It is usually the case that once the habitat for these vulnerable species is gone, so are they.

Chiltern Beechwoods and other Ancient Woodlands are recognised as *irreplaceable* in the NPPF precisely because they are irreplaceable. This concept should not be diminished in the mistaken belief that ‘mitigation to improve biodiversity’ somehow replaces, or is of equal ecological value to what has been lost or damaged.

Specific policies that the NPPF indicates should restrict development that apply to Dacorum include, but are not restricted to –

- **land designated as Green Belt,**
- Areas of Outstanding Natural Beauty (including land adjacent to)
- Special Areas of Conservation including Chiltern Beechwoods
- National Parks - See ##
- Habitat sites
- Irreplaceable habitats such as Ancient Woodland;
- Local Green Space,
- Sites of Special Scientific Interest;
- Areas at risk of flooding
- Designated heritage assets
- Non- heritage assets of archaeological interest that are demonstrably of equivalent interest to scheduled monuments (e.g. report of mediaeval plateau ridge and furrow farming earthworks adjacent to Bell’s Lane, Northchurch)

NPPF Paragraph 177 clearly states the presumption in favour of Sustainable Development does not apply where the plan is likely to have a significant effect on a habitat site unless an appropriate assessment has concluded that the plan will not adversely affect the integrity of the site. As the Chiltern’s Beechwood Screening Report has not been carried out, decisions regarding sites in close proximity to the Beechwoods at Tring, Ashridge and other sites that will generate sources of increased footfall *should not, at present, be considered to have Sustainable Development status.*

## In NPPF para 172, it states that “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 conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks”. The Glover Report 2019 recommends that sites adjacent to these areas should also be conserved. These should be protected in anticipation of National Park status, Although not specifically included, the precedent that establishes the principle that proposed sites of this level of importance should be given protection is established in NPPF para 176.

**SP1 (2).** There is at least one significant material consideration that means that approval of the development plan should be *delayed until after the results of the Census 2021 when more accurate and reliable population data will become available to form the basis for the calculation of housing need*. This material consideration is that current housing need calculations are unsound and should not be used as proof that exceptional circumstances apply by which restrictions on development to protect large areas of Green Belt and sensitive wildlife and heritage sites are otherwise disregarded.

The basis for this material consideration is the mounting evidence that the calculation of need based on the 2014 population dataset, over-estimates need by approximately 50%. The Campaign to Protect Rural England Hertfordshire ( CPREHerts -See CPRE Herts review of DBC Local Plan Final) justifies a more realistic estimate of Dacorum’s annual housing need as being in the range 351 and 536 dwellings per annum – significantly fewer than the 922 dwellings per annum proposed in the Local Plan. This range is based on the most recent Office for National Statistics 2018-based household projections alone, with allowance for past under-provision and a 3% vacancy rate. Furthermore, since 2018 and the onset of the Covid epidemic, there is estimated to be a national net loss in population of 1.3 million. This will include net losses from Dacorum, meaning that in the short term at least, there will be reduced and slower growth in demand for new homes to be built. In other words,

In the NPPF, Sustainable Development status means that housing needs must be met unless protected areas, or assets, provide a strong reason for rejecting the proposed development. Green Belt land is the primary casualty of presumption of Sustainable Development and would normally qualify for protection. These figures demonstrate that ***at least 50% of the Green Belt land should not be re-designated*** to enable housing as the calculation of need is unsound and therefore exceptional circumstances are not proven. The level of need presented in this Local Plan does not have to be met. Also, under paragraph 175c, for the same reason, developments resulting in the deterioration of irreplaceable habitats such as Ancient Woodland should also be rejected for development as wholly exceptional reasons have not been proven. Any decision counter to this is in breach of the framework as the adverse impacts to these highly valued assets would significantly outweigh the benefits.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS2252

**Person ID** 226496

**Full Name** Mrs Susan Holmes

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>I am very concerned about the impact on the chalk streams and their eco-systems in the area - the Bulbourne, the Gade, the Ver, and the winterbournes - Bourne Gutter, Red.</p> <p>I tweet as <a href="https://www.twitter.com/riverbulbourne">https://www.twitter.com/riverbulbourne</a> , I am a member of the Rivers and Wetlands group of the Chiltern Society ( <a href="https://chilternsociety.org.uk/rivers-wetlands/">https://chilternsociety.org.uk/rivers-wetlands/</a> ), and a river watcher for the Upper Bulbourne, reporting the groundwater levels monthly to the Environment Agency (EA) and concerned local residents</p> <p>The Bulbourne water quality is deteriorating, despite attempts at improving it. Here is the EA classification for the Bulbourne for 2019 and previous years</p> <p><a href="https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039029890">https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039029890</a></p> <p>It now has EA Overall classification for 2019 of poor, including poor for ecological and fail for chemical, and has been plagued by low flows for years.</p> <p>A recent EA 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.</p> <p>Please see attached png of the groundwater monthly measurements taken at Dudswell &amp; Northchurch from 1994-2020, showing the fluctuation even after amelioration measures taken by EA. It has investigated the low flows on the Bulbourne: these documents <a href="http://dacenvforum.org.uk/wp-content/uploads/2019/03/Bulbourne_Briefing_February2019.pdf">http://dacenvforum.org.uk/wp-content/uploads/2019/03/Bulbourne_Briefing_February2019.pdf</a> , <a href="http://dacenvforum.org.uk/wp-content/uploads/2019/03/DEF-EA-Presentation-21-Feb-2019.pdf">http://dacenvforum.org.uk/wp-content/uploads/2019/03/DEF-EA-Presentation-21-Feb-2019.pdf</a></p> <p>give background to how Cow Roast and Northchurch abstractions are reducing baseflows into the upper River Bulbourne.</p> <p>After years of concern about low flow, the pumps at New Ground were turned off and levels improved for a while, but they are gradually dropping again. The Bulbourne is still usually dry at Dudswell in most summers. DEFRA and Affinity claimed the closure of New Ground was an ecological concession, but might have had as much to do with very high nitrate levels, in that area, at that time.</p> <p>The proposed local plan development will make this much worse unless drastic action is taken to protect the chalk streams</p> <p>So I object to the no of houses planned as the aquifers cannot support it</p>

Further reading  
<https://chilternsociety.org.uk/chalk-stream-summit-sees-a-step-change-in-commitment-from-westminster/>  
<https://www.chilternsaonb.org/news/356/19/Our-Chalk-streams-are-in-crisis.-They-need-your-help.html>  
<http://www.colnecan.org.uk/index.php/the-action-plans/rivers-gade-and-bulbourne/rivers-gade-and-bulbourne-description-and-news>

<b>Included files</b>	<a href="#">Groundwater Dudswell Northchurch chart.JPG</a>
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2258
<b>Person ID</b>	1262925
<b>Full Name</b>	Nandipha Jordan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<b>Sustainable Development in Dacorum</b> There are no specific details of the measures proposed to meet the 2050 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2281
<b>Person ID</b>	610662
<b>Full Name</b>	Mr Antony Harbidge
<b>Organisation Details</b>	Chairman

Berkhamsted Residents Action Group (BRAG)

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The principles of sustainable development are understood, however there is a fundamental dichotomy between the aggressive growth targets outlined in this plan and the environmental role of the planning system in protecting and enhancing the natural, historic and built environment of the Borough.</p> <p>As highlighted in BRAG's comments on section 3, 'the visions and strategic outcomes' referred to in Policy SP1 are fundamentally flawed, while the 'proposals and sites' included in the Plan are fundamentally not "<i>sustainable</i>" sites.</p> <p>Readers of paragraphs 19.6 and 19.7 in the 'Managing Development in the Countryside' section are referred to this section for the '<i>justification</i>' of the Green Belt boundary changes but BRAG fails see anything in paragraphs 4.1, 4.2, 4.3 or Policy SP1 that could remotely be described as "<i>fully evidenced and justified</i>" as required by the NPPF.</p> <p>On this basis the Plan fails the sustainability test.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2317
<b>Person ID</b>	1262984
<b>Full Name</b>	Deborah O'Sullivan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<b>Water supply and waste water disposal</b>

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.

Geographers say there are only 210 true chalk streams anywhere in the world and the Chilterns is home to 9 of these rare and precious habitats. The siting of housing must not be allowed to degrade these special places.

The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This would take many years to complete, and be extremely expensive as well as disruptive to affected communities.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS2324

**Person ID** 1262981

**Full Name** Chris Mabley

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** The presumption to grant development proposals unless material consideration can indicate otherwise is too subjective and favours large developers with investment capital. They can bully planners and harrass local communities. All development must be considered in the light of policy and its impact properly assessed before permission can be granted. Further, planning permission must be conditional in terms that can be enforced. Laissez faire is breaking Upper Bourne End Lane, for example.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS2351

<b>Person ID</b>	1262244
<b>Full Name</b>	Estelle Wraight
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	It is not sustainable as not creating local jobs in the area. It is turning Dacorum into a commuter suburbia of London, with terrible access links and already congested roads.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2362
<b>Person ID</b>	1261821
<b>Full Name</b>	Chris Cole
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2368
<b>Person ID</b>	1254107

<b>Full Name</b>	Polly Eaton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>“4.2 Sustainable development is about meeting the needs of the present without compromising the ability of future generations to meet their own needs and making economic, environmental and social progress for current and future generations.” This is lip service; the proposal makes no insistence on addressing the environmental needs of present or future generations.</p> <p>Instead there should be clear expectations for the land linked with sustainability and the environment including maintaining, and developing, biodiversity, including fauna and flora, and geodiversity.</p> <p>Account should be taken of the National Pollinator Strategy 2014 to 2024: Implementation (NPS, to be found at <a href="https://www.gov.uk/government/publications/national-pollinator-strategy-2014-to-2024-implementation-plan#:~:text=The%20National%20Pollinator%20Strategy%20sets,%2C%20flies%2C%20butterflies%20and%20moths.&amp;text=Added%20a%20link%20to%20the%20evidence%20statements%20and%20summary%20of%20evidence">https://www.gov.uk/government/publications/national-pollinator-strategy-2014-to-2024-implementation-plan#:~:text=The%20National%20Pollinator%20Strategy%20sets,%2C%20flies%2C%20butterflies%20and%20moths.&amp;text=Added%20a%20link%20to%20the%20evidence%20statements%20and%20summary%20of%20evidence</a>). 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. This does not mean monoculture parks but biodiverse areas of 'wildflower recovery areas' to provide opportunities for conserving pollinators, as outlined in the 25 Year Environment Plan (page 10 of the NPS). Any development must be respectful of action fitting to the climate emergency as declared by the country and local government.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2403
<b>Person ID</b>	1227518
<b>Full Name</b>	Mr John LOWRIE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	HemelHGCHGCHGCBerkhamstedHemelHGC
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2470
<b>Person ID</b>	1263080
<b>Full Name</b>	Russell Emson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2495
<b>Person ID</b>	1263101
<b>Full Name</b>	Richard Hall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	The key diagram is poor and difficult to read.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2519
<b>Person ID</b>	222269
<b>Full Name</b>	Georgina Tregoning
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	Water in the East of England is already scarce, and new building should only be agreed where the utility companies are confident that sufficient resources can be provided.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2536
<b>Person ID</b>	1159198
<b>Full Name</b>	Edward Hatley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	This scale of this plan does nothing to protect or enhance the historic nature of Berkhamsted. On the contrary, it seems likely that the proposals will do irreparable damage to the town and its environs.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2539
<b>Person ID</b>	1263174
<b>Full Name</b>	katey adderley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Completely unjustified. Where is the evidence??
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2550
<b>Person ID</b>	1263183
<b>Full Name</b>	Claire Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	Where is the evidence that any of the development planned is sustainable?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2564
<b>Person ID</b>	1262037
<b>Full Name</b>	Jason Silver
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	As previously mentioned green belt house building is not acceptable and I cannot see any evidence or justification for building on green belt sites in this submission. It is not sustainabale or environmentally friendly
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2588
<b>Person ID</b>	1263206
<b>Full Name</b>	Andrew Farrow
<b>Organisation Details</b>	Great Gaddesden Parish Council
<b>Agent ID</b>	1253616
<b>Agent Name</b>	Andrew Farrow
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2605
<b>Person ID</b>	1145686
<b>Full Name</b>	Mrs Sarah Gray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	It does not seem that developments can be sustainable, already the road network struggles to cope with the amount of traffic. The way people live will change after the pandemic and the type and location of housing will change. So dramatically increasing the size of the small market towns of Berkhamsted and Tring is not sustainable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2634
<b>Person ID</b>	1262737
<b>Full Name</b>	Andrew Cassels
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	I don't think 1. b) is appropriate. It reads like a gaping hole that will allow all sorts of marginal projects through without or with limited scrutiny..
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2705
<b>Person ID</b>	1262957
<b>Full Name</b>	Gregory Hukins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	There is nothing sustainable about building houses on greenbelt and degrading the environment and animal habitats and riding roughshod over local ancient monuments. Once these green areas are gone there is no bringing them back. Growth and innovation will be gained by repurposing existing brownfield sites and converting empty commercial property into accomodation. The convential model of building out from cities and towns is no longer valid in the post covid environment where people work from home and cities are loosing commercial tenants.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2715
<b>Person ID</b>	1263247
<b>Full Name</b>	Giselle Okin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The over development of the area will bring considerable pollution and too much traffic to the area which is already busy and crowded. The land should be kept as green belt (it was green belt protected for a reason) and these laws are just being ignored. Wildlife areas will be desimated. This is a lovely, green, leafy area which will be ruined if these plans go ahead.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2755
<b>Person ID</b>	1262722
<b>Full Name</b>	Colin McCready
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2803
<b>Person ID</b>	1263287
<b>Full Name</b>	Jeremy Bonnar
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would</p>

have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS2836

**Person ID** 1263016

**Full Name** Joanna Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** None of the proposed developments can be described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS2866

**Person ID** 1263425

**Full Name** Andrew Farrow

**Organisation Details** Nettleden with Potten End Parish Council

**Agent ID** 1253616

**Agent Name** Andrew

	Farrow
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2889
<b>Person ID</b>	1263430
<b>Full Name</b>	Pru Murray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2892
<b>Person ID</b>	1258862
<b>Full Name</b>	Tim Beeby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Economic role - very little infrastructure provision</p> <p>Social role - local services not accessible by walking or cycling and roads will not take increased traffic</p> <p>Environmental role - doesn't protect environment or biodiversity. Increase in water use not accounted for, waste water problems, damage to chalk streams, overuse for aquifer which is already at limit</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2901
<b>Person ID</b>	1262892
<b>Full Name</b>	Jean Farrer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>There is a fundamental conflict between the overstatement of housing need (922p.p.) for Dacorum and the protection of the environment.</p> <p>The level and intensification of new housing in Berkhamsted, Northchurch and Tring can't be achieved without destroying the settings in which these historic towns sit. Their rural setting is as much to do with their character as their town centres. The map of the planned work shows that it is slowly developing most of the land between South West Berkhamsted and the A41 bypass loop. The 'bypass' will become a perimeter fence for a much larger town. This also loses the 'green lung' which was so important when the bypass was built to protect residents from the noise and pollution from the main road.</p> <p>In the previous Core Strategy, you acknowledged that Hemel Hempstead would attract the greatest concentration of housing with an even spread between the smaller settlements. I don't understand why you think that Berkhamsted, Northchurch and Tring's infrastructure can sustain this level of development whereas you recognise that Bovingdon,</p>

Kings Langley and Markyate have limitations. There has been no assessment of capacity for Berkhamsted, Northchurch and Tring.

You acknowledge that DBC is an enabler of infrastructure rather than a provider – which means you have no control over what is actually delivered by partner organisations. I have seen no tangible infrastructure improvements despite substantial increases in house building in Berkhamsted over recent years. Nor any affordable housing. It is a builder's paradise. They make much higher profits building executive homes on small plots on the Green Belt e.g. Bearroc Park, Shootersway.

In reality, our hospital health care was under huge pressure. long before Covid. Our hospitals in West Herts. are below standard and inaccessible. Our primary care is imploding. Witness the collapse of Milton House and Boxwell Rd surgeries. Their new arrangement at Gossoms End has extremely limited parking on site and none on the High Street.

Rothschild House in Tring has stepped in to provide additional support – but has anyone asked them how they will cope with a 55% increase in households in Tring?

In relation to a transport strategy which will support such a large housing development, I am at a loss to understand how these already busy narrow roads will cope.

The streets through Berkhamsted, Northchurch and Tring are narrow and do not have the capacity to be widened. The new building in Berkhamsted and Northchurch is mainly at the top of hills at some distance from the town centre and station. It is ridiculous to think that walking and cycling will be realistic alternatives to car journeys up and down these steep hills into the town. There are hobby cyclists but most drive to work around here or work from home. Buses do scrape around the narrow residential areas but not reliably enough for people to rely on them for work or leisure.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS2906

**Person ID** 1263377

**Full Name** Jane Messenger

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2920
<b>Person ID</b>	1263440
<b>Full Name</b>	J Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2958
<b>Person ID</b>	1263439
<b>Full Name</b>	Rod Gibberd
<b>Organisation Details</b>	Tring School
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"> <li><i>The Ridgeway Learning Partnership would very much like to be involved in developing and implementing sustainable schools in the Tring area in the near future. This would complement the new build programme which is currently happening on the Tring School site. The Senior Leadership Team at the school have been heavily involved with the design of the buildings and also making them as energy efficient as possible.</i></li> <li><i>If at all possible, we believe there would be benefits to the youth of the region if there could be some student involvement.</i></li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS2984
<b>Person ID</b>	1263478
<b>Full Name</b>	ELIZABETH RAILTON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The overall strategy appears to be target, and possibly developer led, in terms of numbers of homes with all other considerations, particularly conserving the Green Belt environment and enabling the delivery of infrastructure, being very much secondary considerations. This threatens the argument that the development strategy is sustainable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3178
<b>Person ID</b>	1263550
<b>Full Name</b>	ANNABEL FRANCIS

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3179

**Person ID** 1263550

**Full Name** ANNABEL FRANCIS

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3210
<b>Person ID</b>	1263566
<b>Full Name</b>	Frances Read
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable development is about NOT building in the Green Belt and countryside but building on brownfield sites and converting redundant office and retail properties
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3237
<b>Person ID</b>	1154437
<b>Full Name</b>	Melanie Frankel
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I am emailing you to express my objection to the proposed development outlined in Dacorum Borough Council's document entitled "Emerging Strategy for Growth (2020 – 2038)</p> <p>As a resident, I implore DBC to reconsider this plan which imposes massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt and our status as an AONB (in fact the 2019 Glover report recommended that the Chilterns should be given National Park Status). Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily.</p> <p>The following are my principal objections:</p> <ol style="list-style-type: none"> <li>1 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.</li> <li>2 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.</li> </ol>

3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.

4 Impact on infrastructure. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing. It ignores issues such as traffic congestion, education provision and healthcare requirements.

5 Water supply and waste water. The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's three chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. In addition the proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion. If this is not addressed potential pollution of watercourses, especially in times of storm, is extremely likely.

6 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3266

**Person ID** 1261930

**Full Name** Chris Gee

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum** During our time of national lockdown is this the best, most equitable and accessible time for members of the community to comment on the local development plan? How has Dacorum satisfied itself that all peoples have had a fair & reasonable opportunity to comment on the local plan when we are unable to meet councillors and planning staff in person? Not every

person readily has access to enter comments online or the technical ability to do so. There is a chance therefore that the views are not fully representative of the local community and that decisions will be taken without full participation from the affected residents of the borough.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3272

**Person ID** 1261609

**Full Name** DEBORAH CROOKS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** Sustainable Development in Dacorum

There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.

The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.

Berkhamsted and Tring are identified in the plan to be sustainable locations. These are ‘commuter towns’ where many residents work out of borough. There are insufficient employment opportunities locally in Tring and Berkhamsted to sustain the proposed growth.

To ensure future sustainability, there will need to be a significant shift to local employment, there are no proposals in the plan to make the necessary employment space available for a change of this scale.

Delivering the Infrastructure to Support Growth

The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).

Plans must promote green mobility: Home and public electric vehicle charge points, cycle paths and developers to contribute to the development of reliable electric local bus network with strengthened grid supply to support it

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3284
<b>Person ID</b>	1263610
<b>Full Name</b>	BRYN HENRY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate</p> <p>Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

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<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS3285
<b>Person ID</b>	1263610
<b>Full Name</b>	BRYN HENRY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

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<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS3297
<b>Person ID</b>	1263620
<b>Full Name</b>	EMMA SIMMONDS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

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<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS3298
<b>Person ID</b>	1263620
<b>Full Name</b>	EMMA SIMMONDS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate</p> <p>Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p>

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<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS3310
<b>Person ID</b>	1263631
<b>Full Name</b>	GAVIN NICHOL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p>

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<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3311
<b>Person ID</b>	1263631
<b>Full Name</b>	GAVIN NICHOL
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.</p> <p>Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.</p>

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<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3325
<b>Person ID</b>	1263643
<b>Full Name</b>	IAN DESTE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

\* Yes  
\* No

**Sustainable Development in Dacorum**

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**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3326

**Person ID** 1263643

**Full Name** IAN DESTE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

## **Sustainable Development in Dacorum**

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I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3358

**Person ID** 1263693

**Full Name** Ruth Colderwood

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum**

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3387
<b>Person ID</b>	1263124
<b>Full Name</b>	Andrew Criddle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<i>No comments</i>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3393
<b>Person ID</b>	1207786
<b>Full Name</b>	Anne Foster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<b>The proposals for Berkhamsted are again aspirational with little foundation or supporting evidence</b> <i>Growth in Dacorum will have been environmentally sustainable and have helped to reduce the Borough's contribution to climate change through the location and design of development, by having promoted energy efficiency and renewable</i>

*energy and sustainable construction, by having facilitated a significant increase in sustainable travel modes and through having supported reductions in the use of finite resources.”*

This certainly cannot be said of the Proposals for Berkhamsted

### **Housing Numbers**

I appreciate that overall numbers are handed down from government, but given that the latest 1023dpa ( 922) is over twice the need (355 - 497 if the formula is applied) indicated by the latest 2018 ONS figures

DBC should be mounting a robust challenge to the numbers proposed by government, particularly in view of the Green belt constraints in the area, the NPPF regulations on Greenbelt and government’s commitment to preserving Greenbelt. Para2.29 of the Planning for the future white paper accepts that this has not yet been taken into account in calculating housing numbers

*“In particular, the methodology does not yet adjust for the land constraints, including Green Belt. We will consider further the options for doing this and welcome proposals.”*

The plan appears to prioritise Growth over environmental considerations in an effort to meet the unsupportable numbers issued by government.

### **Sustainability**

The proposed release of Greenbelt at the top of the steep sided valley, can in no way be described as being sustainably located *“close to passenger transport, facilities and employment opportunities”*

None of those are a walkable, or cycle-able, distance for most, from the proposed sites. Even if the use of electric bikes increases, as envisaged in the Transport Study, there are no safe cycle ways, and none are proposed. There is no regular intra town public transport and the Transport Study acknowledges in any case that cost would preclude its usage.

## **Included files**

<b>Title</b>	Sustainable Development in Dacorum
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<b>ID</b>	EGS3398
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<b>Person ID</b>	1263763
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<b>Full Name</b>	Adam Kindred
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<b>Organisation Details</b>	CBRE
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<b>Agent ID</b>	1263757
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<b>Agent Name</b>	Adam Kindred
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<b>Agent Organisation</b>	
---------------------------	--

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>It is interesting to note that the key principles of the Sustainable Development Strategy make no reference to how the strategy responds to its ecological context. Furthermore, the ‘supporting evidence’ for SP2 only refers to the Spatial Hierarchy documents which principally deal with access to services and connectivity. Whilst the Spatial Hierarchy documents are key informants to the spatial strategy, pursuing this in isolation from other key evidence results in the Sustainable Development Strategy being unjustified, notably in how it responds to its environmental context.</p> <p>Noting that survey data from the Chiltern Beechwoods Topic Paper (2020) states that the greatest recreation impact on the natural resources comes from Berkhamsted, the below key principle for a step change in growth is at odds with this:  <i>‘Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations.’</i></p> <p>Whilst acknowledging that a greater role could be played by Berkhamsted and Tring, this has to be balanced against the recreational pressure that additional development in this location would place on the SSSI. The Sustainable Development Strategy should reflect a greater role for Kings Langley (in being the settlement furthest away from the SSSI) as a location that can sustainably accommodate more housing and complement the growth arising from Hemel Hempstead.</p> <p>At present the Draft Local Plan allocates housing as follows: Tring (2,700), Berkhamsted (2,220) and Kings Langley (275). By comparison, the population of Tring is circa double that of Kings Langley but the Draft Local Plan proposes almost 10 times the amount of housing growth.</p> <p>Beyond this being a key requirement to ensuring the preparation of a plan that can be found sound, Section 40 of the Natural Environment and Rural Communities Act 2006 also places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.</p> <p>Paragraph 7.5 of the Draft Plan states <i>‘We have therefore progressed the Plan on the basis of this new housing need calculation of 922 homes pa (i.e. 16,596 homes over the period 2020-38). We recognise 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.’</i> As previously noted in response to other questions, the draft plan should meet the requirements for 1,023pa as required by the Standard Methodology in ensuring the provision of a plan that is positively prepared.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3482

<b>Person ID</b>	1263805
<b>Full Name</b>	Andrew Criddle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><i>The policy requirement to deliver 2,700 homes within Tring wherein the majority is located within the Green Belt, cannot be justified in planning terms.</i></p> <p><i>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead.</i></p> <p><i>There has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.</i></p> <p><i>The strategy of directing so much growth to Tring is flawed. Other strategies have been insufficiently explored before proposing draft Policies SP2, SP3, SP4, SP6.</i></p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3493
<b>Person ID</b>	1263810
<b>Full Name</b>	David Tolfree
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	The proposal includes building 2700 homes in Tring which is a small market town which has its links with Rothschilds era. New developments will not blend in with the area and it will not become a market town with the extra houses
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3515
<b>Person ID</b>	1263824
<b>Full Name</b>	Nichola Criddle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><i>The policy requirement to deliver 2,700 homes within Tring wherein the majority is located within the Green Belt, cannot be justified in planning terms.</i></p> <p><i>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead.</i></p> <p><i>There has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.</i></p> <p><i>The strategy of directing so much growth to Tring is flawed. Other strategies have been insufficiently explored before proposing draft Policies SP2, SP3, SP4, SP6.</i></p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3528
<b>Person ID</b>	1263821
<b>Full Name</b>	Anne Isherwood
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	It is likely that remote working will become more prevalent and there will be less need for London commuters to live in Dacorum. A consequential reduced demand for housing should first be met by using brownfield sites and the conversion of commercial premises for housing.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3542
<b>Person ID</b>	1145631
<b>Full Name</b>	Mr Alastair Greene
<b>Organisation Details</b>	Clerk Little Gaddesden Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3554
<b>Person ID</b>	1263797
<b>Full Name</b>	Chloe Collins

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>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.</p> <p>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</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3556
<b>Person ID</b>	1263468
<b>Full Name</b>	Bruce Day
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I believe that the overall vision for Dacorum is driven by a perception of the amount of housing required. The published requirement for sustainable development (SP1) is therefore not met because the scale of increases will further encourage commuter town status to the detriment of a "strong, vibrant and healthy community". This is particularly the case because the high average price of houses in the borough (£454,000 is quoted as just below London prices according to study documents associated with the draft plan) will make "affordable housing" an unrealistic objective for those with real</p>

housing need. Indeed the way in which development is negotiated, much of the proposed housing developmen will only fuel the growth (and hence unaffordability) of houses in Dacorum.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3575

**Person ID** 1257698

**Full Name** Peter Block

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** The previous Local Plan was not sustainable, this even less so. I imagine there is sufficient office accommodation for the future, especially with the expected long term trend of partial working from home. There is a shortage of manufacturing and service industry space and job opportunities for the current population; this is even more the case for the latest Local Plan.

50 years ago when we moved to Berkhamsted there was a shortage of water, and water cress beds were abandoned; sewerage drains were not fit for purpose, electricity supply was erratic. None have improved since. In the meantime gas supply lines have aged, medical provision has dwindled to a most unsatisfactory level and although the A41 bypass was a blessed relief to Berkhamsted High Street, other traffic has soared and the centre of Berkhamsted is a bottleneck. We are constrained by being a linear town situated on the valley floor and in general, roads cannot be widened.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3586

**Person ID** 369415

**Full Name** Mr Dacorum EnvironmentalForum

**Organisation Details** Chair  
Dacorum Environmental Forum Waste Group

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><i>“Policy DM22 5. Sustainability statements will be assessed on their merits but with an expectation that all measures should be satisfactorily met unless there is clear and convincing evidence as to why any measure(s) cannot be implemented, and if so, that alternative sustainability measures should be proposed.”</i></p> <p>In Parts 1 to 4, Biodiversity is frequently referred to in various contexts, including mitigating biodiversity loss, encouraging net biodiversity gain by developers, etc., but there is not enough emphasis on these policies being mandatory rather than aspirational, or any specification of the grounds on which the policies could be circumvented, implying that it will be up to planning officers to be swayed by representations from developers.</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 <a href="http://dacenvforum.org.uk/">http://dacenvforum.org.uk/</a> and look under "Consultations etc."</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3591
<b>Person ID</b>	1263865
<b>Full Name</b>	Robin McMorran
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	This is utter greenwash. Prefacing a plan to concrete over acres of green belt land and cover it with bogging Wimpey houses with weasel words like "protecting and enhancing the natural environment" and "helping to improve biodiversity" is beyond cynical. This is Orwellian Newspeak at its finest.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3651
<b>Person ID</b>	1263890
<b>Full Name</b>	Chris Munday
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	Your proposals do not correlate to the aspirations set out here. I do not see a cross reference to any of these in the plans for Tring. I question whether the listings are hierarchical so economic is more important than social and environment. It appears that the need to generate more housing as overridden the words.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3654
<b>Person ID</b>	1263887
<b>Full Name</b>	Atherton Powell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Sustainable Development in Dacorum</b>	Building on greenbelt land around Tring contradicts the environmental role of the planning system. It will literally destroy the environment and natural habitats and place huge demands on already over burdened water and sewage utilities. As for social role, the plan destroys Tring's sense of community as a small town by turning it into a crawling suburb. As regards economic, what shops and businesses are going to open in this proposed area? Businesses are adapting to a very different future that this plan ignores or is now too old for.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3692
<b>Person ID</b>	1263908
<b>Full Name</b>	Thomas Burger
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	Outdated
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3707
<b>Person ID</b>	1263921
<b>Full Name</b>	sarah diehl
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3780
<b>Person ID</b>	1263924
<b>Full Name</b>	Susan Moore
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I do believe that tackling environmental issues, regeneration and well being are at the heart of any arguments against concentrated building plans in Hertfordshire.</p> <p>We need to think of the consequences of such schemes on our resources such as water, green space for nature to flourish and air quality.</p> <p>Lockdown has taught the working generation that proximity to London is no longer a requirement now that the success of working from home or a local hub is established.</p> <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>

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.

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.

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** Sustainable Development in Dacorum

**ID** EGS3818

**Person ID** 1263962

**Full Name** Susie Alderson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** 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** Sustainable Development in Dacorum

**ID** EGS3840

<b>Person ID</b>	1153890
<b>Full Name</b>	elisabeth Bendall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><u>TRING Tr02 and Tr03</u>  <u>Housing on Green Belt Land and in areas of Outstanding Natural Beauty</u></p> <p><i>I am a member of the Grove Fields Residents Association and a signatory to the GFRA response to the Consultation. I agree with the contents of this submission, and I am strongly against building on the Green Belt and the proposed number of homes.</i></p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3843
<b>Person ID</b>	1144948
<b>Full Name</b>	Mr Peter Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Like most people, I accept the need for more houses but this plan goes far beyond proven needs and will undermine the sustainability that it claims to support. The fact that the plan enshrines a policy of development at all costs and the

statement that 'Proposals that are in accordance with the development plan will be approved without delay' provides little hope for good sense and restraint. It pays lip service to 'taking into account - - specific policies in the NPP

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3850

**Person ID** 1263982

**Full Name** Lisa York

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum**

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS3924

**Person ID** 1264025

**Full Name** Caroline Sherwen

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Sustainable Development in Dacorum</b>	The growth proposed is neither sustainable nor respecting the environmental role of planning. Again, where is the imagination and foresight in building in a way that is less harmful?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3926
<b>Person ID</b>	1263988
<b>Full Name</b>	Andrew Grout
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Looking at the map Tring appears to be getting a far larger percentage of new houses than other areas . Why ? The world is also changing , the pandemic is making a lot of people work from home. This trend is likely to continue post pandemic . This will leave a lot of empty offices . It would make far more sense to convert these into flats rather than build on green belt land.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS3958
<b>Person ID</b>	1263249
<b>Full Name</b>	Claire Whitely
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Sustainable Development in Dacorum</b>	<p>I strongly oppose draft policy SP2. Neither the total housing figure proposed (16,596 homes) or the basis of its calculation can be relied on as robust. Subsequently, the policy requirement to deliver 2,700 homes in Tring (SP2.3c) cannot be justified in planning terms, especially as the majority is in green belt land. The Council has failed to justify the target against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities.</p> <p>The target of 922 homes a year seems to have been created despite the knowledge that the guidance it's based on is out for consultation and not established. The target doesn't present a requirement for plan making but is a starting point for determining the level of need in an area. Only after consideration of the level of need, crucially alongside constraints of the green belt, can actual land available for development be determined and a decision be made on how many homes should be planned. The council should reassess the housing target and consider what is practical to deliver in the borough in a way that doesn't undermine the protection of the green belt set out in paragraph 11b. Without such analysis, the council cannot bring forward exceptional circumstances which would justify the use of green belt for housing.</p> <p>No assessment seems to have been undertaken of opportunities to intensify development within existing boundaries of Tring through brownfield development or by considering increasing development intensity at available sites. Irrespective of the final numbers determined, all efforts should be made to fill-in the existing boundaries before encroaching on green belt land, especially within an Area of Outstanding Natural Beauty. It cannot be classed as 'sustainable' development if such things are not taken into consideration.</p> <p>You state at the beginning of this section that sustainable development should <i>contribute to protecting and enhancing the natural, historic and built environment, and as part of this, help to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change</i>. I strongly disagree that the plans laid out fulfil this brief considering the large portion of housing proposed for green belt land in the Area of Outstanding Natural Beauty.</p> <p>The housing needs delivery strategy was that Hemel Hempsted provides the vast majority of housing supply and the rest split between other local settlements to avoid pressure on existing infrastructure. The council have identified that this was discounted due to the constraints on infrastructure in most of these settlements, however no assessment of the impact of the proposed location to the east of Tring has been done so it has not been proven that the development could occur without substantially impacting on infrastructure which is already stretched.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4000
<b>Person ID</b>	1264045
<b>Full Name</b>	Daniel Farr-Smith
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Without further investment in infrastructure, thus development will lead to more cars on our roads and is therefore not sustainable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4028
<b>Person ID</b>	1264059
<b>Full Name</b>	Sarah Mitchell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>1. The way the whole consultation has been designed makes it near impossible to contribute, an incredibly complicated process.</p> <p>2. I am against proposals for the huge quantities of housing around Hemel Hempstead Two Waters area. There is a complete lack of consideration on the supporting infrastructure, in particular the road infrastructure.</p> <p>3. The London Road is already grid locked at most times of the day, it being the only way to reach vital access to the A41 and other local facilities.</p>

4. The recent Bovis estate is a prime example of introducing 325 new homes without the basic infrastructure. Promises for bus routes have been lost, locals had to fight for a basic bridge to enable heavy two way traffic and the lack of parking make the development dangerous with cars parked closely along the main route through the development.

5. Suggestions of cycle routes show no evidence of working on Aspen Park the Bovis estate. It is naive to think that people will be cycling and abandoning their cars.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4032

**Person ID** 1264064

**Full Name** Melanie Ingram

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum** Its unfortunate that Policy SP1 isn;t fit for purpose as it offers no clarity or definition as to what its means within the planning system roles. What is meant by sufficient land of the right type within the economic role - surely the right type is not greenbelt land? There is also no explanation as to how excessive growth (55% increase in the size of Tring) on greenbelt land will support innovation? and what kind of innovation is being implied?

In terms of the policy offering a social role within the planning process to "support health communities" there is no reference to the loss of green space and excessive development targets that can link back to this role.

And finally its role in protecting the environment has not been realised as it has failed to optimise existing brownfield sites across Dacorum for favouring Green belt land usage instead. The excessive growth targets also do not consider the protection of each of the smaller settlement identities and community.

As yet the council have also failed in SP1 .2 to work proactively with applicants to resolve issues and work together to find reasonable solutions with the people who know the areas impacted best (the residents).

**Included files**

**Title** Sustainable Development in Dacorum

<b>ID</b>	EGS4035
<b>Person ID</b>	1264070
<b>Full Name</b>	Michelle Carnegie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I do not understand how the proposed developments can be said to be sustainable or respecting the environmental role of planning. The current proposal builds predominantly on green belt land. it doesnot respect the historic character of Berkhamsted by having a 24% increase in dwellings most of whichare centred around one areawhich is far enough from the station that it would still probably require peopleto drive to there or into town.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4049
<b>Person ID</b>	1250022
<b>Full Name</b>	Mr Michael Ridley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Please see myprevious comments in answer to the first question.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4065
<b>Person ID</b>	1263883
<b>Full Name</b>	New Gospel Hall Trust
<b>Organisation Details</b>	New Gospel Hall Trust
<b>Agent ID</b>	1263872
<b>Agent Name</b>	John john.shephard@jjdesign.org.uk
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>New Gospel Hall Trust object to Policy SP1 and the supporting text. Recent government guidance and advice from Inspectors at Local Plan Examinations has made it clear that it is unnecessary and unhelpful for a Local Plan to repeat national policy with a local nuance. The National Planning Policy Framework is an important 'material consideration' in all planning decisions. It is submitted that Policy SP1 will introduce an element of confusion for decision-makers by attempting to replicate and duplicate the national presumption in favour of sustainable development.</p> <p>Furthermore, the supporting text at paragraph 4.2 appears to overlook the advice of Framework paragraph 9 which advises that the three overarching objectives for sustainable development are not criteria against which every decision can or should be judged.</p>
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4079
<b>Person ID</b>	1264210
<b>Full Name</b>	Fiona Fulford
<b>Organisation Details</b>	myself
<b>Agent ID</b>	1264200
<b>Agent Name</b>	Fiona Fulford
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	Just looking at the map and the proximity of the Chiltern beechwood SAC and AONB and the amount of green belt disappearing within the proposed development plan, how can the level of the development be called sustainable
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4082
<b>Person ID</b>	1264201
<b>Full Name</b>	Philip Hughes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Sustainable Development in Dacorum</b>	4.3 key diagram - this shows housing growth on Green Belt. Surely the point of Green Belt is that it shouldn't be built on?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4084
<b>Person ID</b>	742793
<b>Full Name</b>	Mr Lawrence Sutton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The aim of having “Sustainable Development in Dacorum” is a good in principle. But the changes outlined in the plan completely contradict this aim.</p> <p>In section 4.2 “To achieve this, economic, social and environmental gains should be pursued in an interconnected way.” How can building homes on Green belt land be an environmental gain? This is not interconnected when the development will also have a negative impact on the social fabric of the towns of Berkhamsted and Tring.</p> <p>In section 4.2 “An environmental role – <i>contributing to protecting and enhancing the natural, historic and built environment, and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change</i>”. Building new homes on Green belt land is NOT protecting and enhancing the natural environment. It is also NOT being prudent to build houses on land that will necessitate most people using a car to journey into town and causing more pollution and waste. This is also only going to contribute to the current climate change crisis that the council should be doing everything it can to help mitigate</p> <p>In ‘Policy SP1 - Sustainable Development in Dacorum’ section b. i “any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits” The environmental damage and loss of Green belt land significantly outweighs any perceived benefits of building on this land. The adverse impact on the environment of all the increased cars on the road in Berkhamsted also outweighs any benefits of building on Green belt land.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4094
<b>Person ID</b>	1264223
<b>Full Name</b>	Elaine Mercer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<p>There is a fundamental dichotomy between the aggressive growth targets outlined in this plan and the environmental role of the planning system in protecting and enhancing the natural, historic and built environment of the Borough.</p> <p>There is nothing in paragraphs 4.1, 4.2, 4.3 or Policy SP1 that could remotely be described as “fully evidenced and justified” as required by the NPPF.</p> <p>On this basis the Plan fails the sustainability test</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4130
<b>Person ID</b>	1264256
<b>Full Name</b>	Leslie Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>My coments below refer to the plan in general as it relates to Tring.</p> <p>I also fully suport the more detailed coments submitted by Tring in Transition.</p> <p>1) A very high percentage of the proposed Tring development is to be on Green Belt land, there is, I believe, a strong case for any developments on former Green Belt to be of the very highest possible environmentally friendly, sustainability and energy efficiency standards. Explicit provision should be made for this – if as the plan states the object is to ensure a sustainable futuree for Tring it is vital that not only do they inculde the points above, but that they are maintained. As you will know, the NPPF calls 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 clearly addressed in the plan and is a significant point of non-compliance.</p> <p>2) The plans proposeal build over 2700 new homes in Tring is not compliant with the core of the NPPF guidance for "sustainable development" (which I repeat is meant to be the objective of the plan). The planned development of Tring 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</p>

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.

3. I find it particularly disappointing that the plan paid little or no attention to the earlier public consultation. Which now appears to have been nothing more than a publicity exercise. If you really wanted to consult with the people of Tring you would have started with us.

4. 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.

5. 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.

6. 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.

7.

8. The plans goals for public transport are only aspirational and there is nothing in the Plan that convincingly addresses transport between Tring Station and the town centre (except some vague idea of more cycle paths) or around the new developments, or which supports modern, novel solutions.

9. 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.

10. 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.

11. 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.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4167
<b>Person ID</b>	1145844
<b>Full Name</b>	Dr and Mrs Melvyn Else
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4170
<b>Person ID</b>	1264282
<b>Full Name</b>	Shirley White
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<p>Too much development on the green belt.</p> <p>I am finding it really difficult to complete adding my comments using my phone. The document is very unstable and I can't find the appropriate place to add more comments so I will submit these 2 sections and then email you my remaining comments.</p> <p>Also Nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4172
<b>Person ID</b>	1264269
<b>Full Name</b>	Paul de Hoest
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<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. <b>I agree with the stance taken by all of these groups.</b> 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>Despite best efforts (and I do applaud directionally the intention to try to offset the danaging impact of removing so much Green Belt and biodiversity) it is simply not possible to create so much new building in a carbon neutral or biodiversity enhancing manner. The CO2 footprint of all the construction alone would be enormous - even if the homes are more efficient that the existing housing stock you simply cannot eradicate the impact of constructing these houses and associated roads. As the vast bulk of these properties are of necessity located some distance away from the pre-existing town centres then inevitably this will generate a huge increase in traffic flow which itself will be unsustainable (even if they are electric powered they will still generate CO2 in their construction as well as pollution and congestion in their usage. The necessary volume of traffic will undermine the endeavours of local authorities to restore town centres to the people (as</p>

suggested later in this document). Surely the post-Covid response and the response to the loss of footfall arising from online shopping is to revitalise the social and community aspects of town life? Streams of traffic will scupper this plan dead in the water.

Governments of all stripes and this local authority have repeatedly made pronouncements on the importance of the Green Belt and yet this plan is reliant upon supplementing previous releases of Green Belt with an unprecedented release. Numerous studies have shown the well being benefits of access to Green Spaces and yet this plan, by building another layer of suburbs around the existing towns, essentially puts existing populations even further away from vital footpaths and open spaces. Hence, even more driving to get out of the town for recreational purposes.

When the by pass was constructed 30 years ago it was deliberately decided to run it in the valley beyond the ridge line to the south of Berkhamsted some half a mile away from the town. The importance of this was said to be threefold: 1. to provide "green lung" to retain access for local residents to green spaces but also to avoid excess air pollution. 2. to manage the noise levels and 3. to maintain a natural green skyline. All three of these have been partially eroded since then by uncontrolled development but this plan would destroy any remaining benefits. It is critical to maintain the remaining parts of that original "green lung".

In Berkhamsted 2250 new homes are proposed but no appreciable increase in the local employment opportunities (in fact the reverse - as the Jewsons site which hosts several small businesses is proposed as a development site).

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4193

**Person ID** 1264301

**Full Name** James Stringer

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum**

**Included files**

**Title** Sustainable Development in Dacorum

<b>ID</b>	EGS4235
<b>Person ID</b>	1264320
<b>Full Name</b>	JACKIE GLOSSOP
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p>

I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4236
<b>Person ID</b>	1264320
<b>Full Name</b>	JACKIE GLOSSOP

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “ play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “ delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4239

**Person ID** 1262647

**Full Name** Carolyn Wallis

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I am concerned that the proposed increase in housing will have a detrimental effect on water supplies and will damage our precious local chalk streams. I note that the supporting document relating to water supplies (Water cycle scoping study) was produced in 2010 so is well out of date. The proposed developments covered in that study are well below what is proposed now and yet even then it indicated that more water resources would be needed. Where are the plans for these and when are they likely to be available?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4251
<b>Person ID</b>	1261915
<b>Full Name</b>	Eleanor Lovett
<b>Organisation Details</b>	Landhold Capital
<b>Agent ID</b>	1261754
<b>Agent Name</b>	Eleanor Lovett
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4259
<b>Person ID</b>	1264321
<b>Full Name</b>	David` Fox

<b>Organisation Details</b>	personal
<b>Agent ID</b>	1264318
<b>Agent Name</b>	David Fox
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Just looking at the map and the proximity of the Chiltern beechwood SAC and AONB and the amount of green belt disappearing within the proposed development plan, how can the level of the development be called sustainable?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4300
<b>Person ID</b>	1264325
<b>Full Name</b>	Olivia Halper
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Key Diagram, page 29: Currently the map shows 'St Albans DC Growth Area' and 'Employment Area' as allocations / designations which are located outside the borough boundary in St Albans District. It is not possible to designate or allocate land in a local plan on land which is located outside of the plan area. The key diagram should instead make clear that East Hemel growth areas falling within St Albans District are part of the strategic context of the plan but do not form part of it – this might be better communicated by using indicative shaded shapes rather than clearly defined boundaries, and also correctly referencing them in the legend. Additionally, the map would be easier to read if the main settlements were labelled. These comments apply to all other maps in the Plan with regard to sites identified in St Albans District.

It may be possible to include within the plan that through the DTC with SADC that a proportion of the employment land will be able to count as meeting part of DBC's needs.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4434

**Person ID** 1264384

**Full Name** Mrs Patricia Hill

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum**

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4440

**Person ID** 1264363

**Full Name** Roselyn King

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4441
<b>Person ID</b>	1264316
<b>Full Name</b>	Melanie Turner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The growth proposed is neither sustainable nor respecting the environmental role of planning.</p> <p>The proposed level of development 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.</p> <p>There are impacts on water supply and waste water disposal.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4443
<b>Person ID</b>	1264387
<b>Full Name</b>	Mrs Joy Sheppard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4480
<b>Person ID</b>	1264395
<b>Full Name</b>	R Jane Dickson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The emphasis in this section seems to be on providing new homes and an assumption that having a larger labour force will justify including “20 hectares of new office and industrial development land within Employment Growth Areas” as well as “additional retail floorspace in Dacorum’s towns”. However, it is quite possible that the Covid-19 Pandemic will lead to a permanent increase in people working from home and shopping online and that there may be a surplus of office and retail space, rather than a need for more. While Dacorum might well be seen as an ideal, if expensive, location for London commuters, a trend toward more home working would possibly decrease the demand for property in such an expensive area and further decrease the need for retail and commercial units. Sustainability might best be achieved by re-purposing surplus retail and office units for residential use.</p> <p>Surely a Sustainable Development Strategy should also pay more attention to Climate Change? In 2019, Dacorum Borough Council declared a climate emergency but this strategy prioritises economic growth and the development of Greenfield Sites.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4481
<b>Person ID</b>	1264398

<b>Full Name</b>	Caroline Merritt
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The Markyate development is not sustainable for the existing infras
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4517
<b>Person ID</b>	1261836
<b>Full Name</b>	Richard Sutton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<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>

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.

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** Sustainable Development in Dacorum

**ID** EGS4568

**Person ID** 1145918

**Full Name** Mr Richard Tregoning

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum**

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4591

**Person ID** 1264453

**Full Name** Fiona Hinton

**Organisation Details** Myself

**Agent ID** 1264426

**Agent Name** Fiona Hinton

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	Full evidence for removing Green Belt designation (as required by the NPPF) needs to be provided before this can be considered. Green Belt is there for a reason, and these requirements are necessary to protect it.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4600
<b>Person ID</b>	1263004
<b>Full Name</b>	Jill Townsend
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Sustainable Development in Dacorum</b>	<p>Encroaching onto Green Belt land should not happen under any circumstances when there are alternative brown field sites. This plan is aimed at giving developers the green light to build properties that will make them the most money, such as 5 bedroom properties selling at high prices, out of reach of young people desperate to get onto the housing ladder and to start their own families, in their own homes where they were brought up themselves and have family connections and support.</p> <p>The likes of TW, Bellway etc do not care about the towns they build properties in - they are interested in their profits and it the higher profit margins are in high end properties rather than say starter and first move homes.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4613
<b>Person ID</b>	1264462
<b>Full Name</b>	Penny Clifton

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The proposed growth is neither sustainable, justified nor evidenced in this plan. It does not respect the environment and there is no justification for using Green Belt land anywhere in Dacorum. The Green Belt should be retained at all cost.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4623
<b>Person ID</b>	1264477
<b>Full Name</b>	Vivianne Child
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The scale of increase in development considered for Tring is excessive, illustrating that the Local Authority has inadequate understanding of the highly distinctive character of Tring as a small, attractive market town.</p> <p>Within the section delivering development around Tring it is developer-led, with input from the local authority lacking authoritative detail. The plans show a lack of understanding of the highly distinctive character of Tring town and the surrounding area, together with its current state and future needs. Developer-led development is seen by local authorities as the cheapest way of providing development with only lip service paid to sustainability. This provides the local community with housing and infrastructure that the developer wishes to provide at a profit for their shareholders - not the development that a community deserves and this approach to development growth is not value for money if it does not deliver what is necessary to ensure a sustainable future.</p>

A 55% increase in housing for a small market town is totally inappropriate, given its setting within the AONB, and surrounded by Green Belt land. There can be no meaningful sustainable development strategy that will address the issues resulting from such a large increase. Whilst acknowledging that there is a need for development in Dacorum the draft plan is a wholly inadequate response to the challenges faced by the need for sustainable development. A large increase in human pressure will result from the DBC proposals and further deterioration on the local environment. The plan lacks the strength needed to address adverse impacts, both from current levels of stress on the environment and increased future impacts. This draft plan is governed by a developer-led strategy which will fail to deliver the necessary, but much reduced, sustainable growth that Dacorum and especially Tring deserve.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4625

**Person ID** 1143273

**Full Name** Mr Mark Rogers

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum**

The housing target numbers are far too High. Realising that these have come down from Government the Borough should strive to do EVERYTHING THEY POSSIBLY CAN TO OPPOSE THESE NUMBERS. There needs to be a re-balancing, hence reduction on the number of homes to be built in Dacorum. The planned numbers will see a destruction in the essence of the Green belt and all surrounding areas in Dacorum. The national ONS numbers reduce the planned numbers of houses NOT 300k pa for England but closer to 170k based upon the most recently available data. with an estimated fall in population of 1.4m in 202 this continues the downward trend seen in more recent data from ONS in 2018 and FAILS TO TAKE ACCOUNT OF BREXIT, THE GENERAL ELECTION AND THE PANDEMIC. 170k/300k should see a reduction of 44% in NATIONAL targets, I believe that an even GREATER reduction should be attributed to Dacorum to 'balance up with the north'. In order to achieve the required numbers of new homes the 922 target (increased to 1023 in Dec20) should be reduced by a minimum of 44% and closer to 60%, leading to a physical target of between 525 and 370.

This plan takes little notice of the changing dynamics and needs of home provision in Dacorum but a blind obedience to Government dictats. Increasing density of homes closer to HH Town centre will bring significant benefits in many ways:

Greater tax take and opportunity to increase expenditure on infrastructure and local community facilities

**Housing:** Greater intergenerational living centres with a wider opportunity to integrate families through a range of accommodation to cater for all life stages, including:

- Single person studios
- 2 bedroom couple flats
- 3 bedroom family flats
- Larger high-quality premium 'penthouses' apartments – eg KODAK Building
- Independent elders living close to other family members
- Assisted living apartments for less able older communities integrated into more socially cohesive communities
- Multi-home communities contributing to greater care in the family/community hubs
- Office block conversions
- Family homes best located nearer to schools

Increasing ability for extended families to live in close proximity and to look after elder generations.

Working from home is becoming more prevalent for Dacorum as commuting into London has reduced demand.

As more retail space becomes available, this provides the opportunity for more conversions to homes.

These factors should contribute to reducing the demand for housing and hence the continuance of designated Green Belt.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4669

**Person ID** 1145431

**Full Name** mr David van Rhee

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Sustainable Development in Dacorum** I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

There is a problem in Tring where it is very difficult for the children to remain in the town when they have completed education and start work. We see many young adults forced to move to Leighton Buzzard and Aylesbury etc where housing is more affordable, although they would rather live nearer to parents and grandparents in their home town of

Tring. Whilst recognising that large 4-5 bedroom houses achieve a better yield for the developers, I believe that affordable housing should be a higher priority to the council. But not half as many houses in addition to the current stock.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS4690

**Person ID** 1264485

**Full Name** Charlotte Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Sustainable Development in Dacorum</b>	Nothing in this section I can see is fully evidenced and justified as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable or respecting environment in planning.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4728
<b>Person ID</b>	1261255
<b>Full Name</b>	Sarah Lightfoot
<b>Organisation Details</b>	
<b>Agent ID</b>	1261248
<b>Agent Name</b>	Sarah LIGHTFOOT
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The aggressive growth targets outlined in this plan and the environmental role of the planning system in protecting and enhancing the natural, historic and built environment of the Borough are at odds.</p> <p>The 'proposals and sites' included in the Plan are fundamentally not "sustainable" sites and fail on economic, social AND environmental requirements. It's not the right type of land in the right places; it will overwhelm the current community and lack accessible local services; and as far as '<i>contributing to protecting and enhancing the natural, historic and built environment, and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change</i>' is concerned, will do just the opposite.</p> <p>There is nothing in the plan regarding the destruction of Green Belt that can in any way be described as "fully evidenced and justified" as required by the NPPF.</p> <p>On this basis the Plan fails the sustainability test</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4747
<b>Person ID</b>	1264491
<b>Full Name</b>	Paul Wade

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	There seems to be very little actual evidence provided that the plans are sustainable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4778
<b>Person ID</b>	1264475
<b>Full Name</b>	Simon Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4815
<b>Person ID</b>	1257705
<b>Full Name</b>	Mark Barfield
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach</p>

was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

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.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4817
<b>Person ID</b>	1264521
<b>Full Name</b>	Max Hidalgo
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	The plans proposed contradict the term sustainable. Dacorum needs to review the proposals under this term. Sustainable infrastructure means development in harmony with the environment and green belt consumption cannot be considered if Dacorum want a truly sustainable development. There are many other areas within dacorum that could easily take high density housing with easy access to the road networks, for example the ex industrial estates, buncefield areas etc. To eat into green belt on both sides of berkhamsted will suffoctae the town further which is already struggling to cope with the extra housing developments. Most residents feel that berkhamsted is at capacity and the roads and infra structure cannot sustainably take more
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4823
<b>Person ID</b>	1264524
<b>Full Name</b>	Karen Kang
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4948
<b>Person ID</b>	1264547
<b>Full Name</b>	Sara Penn Williams

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Much of the proposed development would negatively impact on the natural environment, with building on green belt land and of course the increased strain from extra housing and extra cars etc. I cannot understand how this can be viewed as sustainable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS4950
<b>Person ID</b>	1264544
<b>Full Name</b>	Bethan Fox
<b>Organisation Details</b>	Personal comment
<b>Agent ID</b>	1264539
<b>Agent Name</b>	Bethan Fox
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Looking at the map, with the proximity of the Chiltern beechwood SAC and AONB to the housing development and the amount of green belt disappearing within the proposed plan, how can the level of the development be called sustainable?  It is in no way preserving natural resources for future generations, or in any way trying to halt climate change as was promised in the very definition of sustainability provided.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS4979
<b>Person ID</b>	1263960
<b>Full Name</b>	Mr Tim Amsden
<b>Organisation Details</b>	Chairman Tring & District Local History & Museum Society
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	In no sense can development on the scale proposed be considered sustainable. It will take a large acreage out of food production, degrade the land with pollution and road traffic and place undue strain on water resources.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5023
<b>Person ID</b>	1264258
<b>Full Name</b>	Fintan FitzPatrick
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5025
<b>Person ID</b>	1264557
<b>Full Name</b>	Natalie Crane
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5050
<b>Person ID</b>	1264550
<b>Full Name</b>	Kevin Fielding
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	"Sustainable development is about meeting the needs of the present without compromising the ability of future generations to meet their own needs"

Building large scale housing estates of largely detached houses on Chiltern Green Belt is not sustainable. It is removing Green Belt land with agricultural and public amenity, and diverse wildlife that have been enjoyed by this, and previous, generations. These assets cannot be replaced. This is, and future generations of Dacorum residents will be impoverished because of this policy.

If it wishes to adhere to the NPPF, Dacorum should optimize the housing potential of its brownfield sites to provide appropriate and sustainable housing for all its residents and their offspring, It is going against the National Plan if it expands into surrounding agricultural land. This would clearly be unsustainable and would immediately impoverish the lives both of current residents, and of future generations

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS5069

**Person ID** 1264532

**Full Name** Robert Clarke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** Increased housing will not necessarily lead to increased employment. In any event the recent pandemic may well change the way people work and live and a complete review should now be made using up to date information.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS5093

**Person ID** 1264563

**Full Name** Liam Beere

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5118
<b>Person ID</b>	1250013
<b>Full Name</b>	Mrs Nikki Bugden
<b>Organisation Details</b>	Clerk Nash Mills Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p><b>The Housing Strategy - Potential overprovision of housing</b></p> <p>We support the need for additional housing, in particular affordable housing, and understand the potential need to encroach on existing green belt in order to meet housing needs.</p> <p>However, we support comments from CPRE (The Countryside Charity) and fellow parish councils that data used to estimate housing requirements should be the most current data available (using Office of National Statistics data from 2018 rather than 2014) and that Dacorum's allocation is fair in comparison to other boroughs. We note that paragraph 7.5 in the draft plan also acknowledges that proposed changes to government methods of calculating housing could mean that the figure used in the plan is not correct.</p> <p>We need to be sure that over-estimations do not lead to unnecessary use of green belt.</p> <p>The plan also needs to further consider changes likely to occur as a result of the pandemic. Will unused office space provide opportunity for conversion to residential property, minimising the need to build on green belt?</p>

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5149
<b>Person ID</b>	1264509
<b>Full Name</b>	Hannah Fox
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Just looking at the map and the proximity of the Chiltern beechwood SAC and AONB and the amount of green belt disappearing within the proposed development plan, how can the level of the development be called sustainable?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5182
<b>Person ID</b>	1264593
<b>Full Name</b>	Rebecca Mackenzie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	How is building on green belt sites sustainable? Surely the need for housing is not so dire in these areas that this is justified?

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5192
<b>Person ID</b>	1264601
<b>Full Name</b>	Tania Barney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5202
<b>Person ID</b>	1264608
<b>Full Name</b>	Nicola Beadle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Just looking at the map and the proximity of the Chiltern beechwood SAC and AONB and the amount of green belt disappearing within the proposed development plan, how can the level of the development be called sustainable?

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5252
<b>Person ID</b>	1263726
<b>Full Name</b>	Andrew Gifford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Both developments allowed in Berkhamsted at the bottom of Crossoak road are partially filled if DBC were serious on sustainable development empty or repurposed buildings would allow for better use of current buildings whilst driving economic benefit. We are currently down to 17% of forestry left and building on the green belt puts this further at risk.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5254
<b>Person ID</b>	1175740
<b>Full Name</b>	Berkhamsted Schools Group
<b>Organisation Details</b>	The Berkhamsted Schools Group
<b>Agent ID</b>	1175743
<b>Agent Name</b>	Kevin Rolfe
<b>Agent Organisation</b>	Group Director, Development & Planning Aitchison Raffety
<b>Yes / No</b> * Yes * No	

<b>Sustainable Development in Dacorum</b>	BSG supports <b>Policy SP1 - Sustainable Development in Dacorum</b>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5316
<b>Person ID</b>	1264616
<b>Full Name</b>	Philip Daw
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The growth proposed is neither sustainable nor respecting the environmental role of planning.</p> <p>The proposed level of development 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.</p> <p>There are impacts on water supply and waste water disposal.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5325
<b>Person ID</b>	1264599
<b>Full Name</b>	Mike Keeble
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	I completely object to the use of so much greenbelt land. I fail to see how any argument can be made to suggest this is sustainable. What other brownfield sites in the local areas could be re-developed? have all of these options been considered?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5358
<b>Person ID</b>	1264048
<b>Full Name</b>	Alison Fraser
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	'Proposals that are in accordance with the development plan will be approved without delay, unless material considerations indicate otherwise'. I am concerned that this will give developers carte blanche to cherry pick, the earmarked sites for development that will have the most profit for them first; rather than building houses where they are most needed; or on brownfield sites in perhaps less desirable areas. All available brownfield sites should be built on first; before any green belt land or green amenity land is used for houses. Green belt and green land within established developments should be built on last; when we know that there is still a need for housing (Brexit and the pandemic may change what was envisaged even a year ago). As an example a developer put a leaflet through my door with plans for 150 homes on green belt land that had been identified for housing; within a few weeks of the plan being released. Even the 'affordable' houses within their plan, are very unlikely to be anywhere near what most people aspiring to buy would call affordable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5385

<b>Person ID</b>	1264628
<b>Full Name</b>	sophie boden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>How is this sustainable development. You highlight the importance of an environmental role and 'managing growth in a positive way' when your plans will obliterate significant areas of green belt. Hasn't lockdown taught us how important our green space is and you are planning to destroy it?</p> <p>By putting so many different areas in to develop you are also putting people at odds with each other, forcing them to opt for where we want the green belt destroyed. The answer to all of this is, this is not supporting the environment so is not sustainable development.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5410
<b>Person ID</b>	1264636
<b>Full Name</b>	Lynsey Bilsland
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I don't think the removal of Greenbelt land can ever be justified and the impact of this will significantly outweigh any perceived benefit to the town.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5447
<b>Person ID</b>	1264647
<b>Full Name</b>	Richard Burnell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Repurpose empty or underused commercial and/or retail sites in the borough before developing rural areas. Existing brownfield sites will have the necessary infrastructure in place whereas greenfield sites are less likely to. Brownfield sites will require less resources to repurpose and will be more sustainable than Greenfield sites. Brownfield sites will permit the reprocessing of construction materials in the conversion of the built environment rather than building from scratch.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5450
<b>Person ID</b>	1264591
<b>Full Name</b>	Kim Baiden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5531
<b>Person ID</b>	1264652
<b>Full Name</b>	Gillian Macdonald
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	It is important for the wellbeing of everyone that new development should be in keeping with the local environment. In the villages trees and hedges should not be indiscriminately destroyed but be an integral part of any development. The size and type of housing should also be sympathetic and in keeping with the character of the village. No blocks of flats for instance towering over existing homes just to save money or cram in social housing. And social housing should mean small family homes with gardens. There is not enough of this type of housing and very little incentive for developers to build small houses despite the shortage.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5532
<b>Person ID</b>	1264657
<b>Full Name</b>	Amanda Hutchinson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<p>4.2 it is not environmentally sustainable to build on green belt land. This detrimentally affects the environment. The proposed development is a massive expansion which will result in significant loss of green space, without any protection for the remaining green belt land. This neither protects nor enhances the natural environment. Most of the proposed building sites are not sustainable.</p> <p>Policy SP1 It should be an absolute requirement that all new homes are carbon neutral, have parking and charging points for electric cars, be designed to maximise natural heating and ventilation and include solar panels.No gas boilers should be permitted and connection to high speed broadband should be mandatory. Aspirational wording is not sufficient - too many developers will find ways to cut corners unless forced to adhere to the highest standards.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5534
<b>Person ID</b>	1264651
<b>Full Name</b>	Tom Beecroft
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I concur with all Northchurch Parish Coucil's objections (please refer to their response for detail):</p> <ul style="list-style-type: none"> <li>• Dacorum's Strategy uses out-of-date projections</li> <li>• Dacorum's strategy fails to protect the Green Belt</li> <li>• Dacorum's strategy fails to protect the River Bulbourne</li> <li>• Dacorum is not obliged to meet these 2014 figures</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS5594
<b>Person ID</b>	1264679
<b>Full Name</b>	Paul Firth
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	There are no significant proposals for improvements to roads or traffic flows within Berkhamsted. An increase in the number of dwellings within Berkhamsted and Northchurch of 24% increases urban footprint by 31% and the number of daily car movements by 15,400, yet there are no proposals to deal with this. Not very sustainable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5608
<b>Person ID</b>	1144878
<b>Full Name</b>	Mr Peter Moore
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	The Policy is sweeping and does not articulate how development will contribute to sustainability. Clause B appears to give the Council carte blanche to develop in the absence of policies. It would therefore appear that to achieve development the writing and acceptance of policies will be discouraged.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5628
<b>Person ID</b>	1264689
<b>Full Name</b>	Philip Hobden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5654
<b>Person ID</b>	1264710
<b>Full Name</b>	Jess Malcolm
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<b>An environmental role</b> – You are not acting for the welfare of our environment, you are causing its destruction and will kill hundreds of animals in the process.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5668
<b>Person ID</b>	1264405
<b>Full Name</b>	Natalie Beecroft
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I concur with all Northchurch Parish Council's objections (please refer to their response for detail): <ul style="list-style-type: none"> <li>• Dacorum's Strategy uses out-of-date projections</li> <li>• Dacorum's strategy fails to protect the Green Belt</li> <li>• Dacorum's strategy fails to protect the River Bulbourne</li> <li>• Dacorum is not obliged to meet these 2014 figures</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5696
<b>Person ID</b>	1263239
<b>Full Name</b>	Robert Farrer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Sustainable Development in Dacorum</b>	There is an obvious chasm between the 'green talk' in the document and the reality which produce a massive erosion of Green Belt land.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5720
<b>Person ID</b>	1264678
<b>Full Name</b>	Tom A
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5741
<b>Person ID</b>	1264697
<b>Full Name</b>	Nicholas Wood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	You state admirably that ' sustainable development is about meeting the needs of the present without compromising the ability of future generations to meet their own needs', yet you propose to remove vast swathes of green belt land without proven need which will fundamentally remove the health, exercise and wellbeing options for future generations. The criteria for house building plans you are using are outmoded and based on old data that predates both COVID and Brexit. A recent Bank of America report sees no increases in the workforce in London in the next 5 years due to falls in office based working and Brexit related immigration changes yet you insist on drawing up housing targets based on immigration and working data from another era. The release of green belt land is supposed to be only in 'exceptional circumstances'. I do not believe those circumstance exist any more, or at the very least the assumptions underlying them need to be revisited in the wake of Brexit and the home working revolution that has been unleashed by Covid 19.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5771
<b>Person ID</b>	1264473
<b>Full Name</b>	Jane Read
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	The Long Marston site is NOT in accordance with many statements and criteria set out in the Plan.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5776
<b>Person ID</b>	1264741
<b>Full Name</b>	pete

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5810
<b>Person ID</b>	494828
<b>Full Name</b>	P Marshall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Applying to all developments across Dacorum I can see no mention of fresh water supply capacity, and sewerage capacity.  Have works been done to suggest that the level of housing denisities suggested in the plan are possible with these factors?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5814
<b>Person ID</b>	1264750

<b>Full Name</b>	Neil Joyce
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	Tring - any major development will severely affect the environmental impact on the town. The growth areas within Dacorum do not take into account the large expansion of nearby Aylesbury, and potential sites just outside the borough boundaries - Pitstone and Aston Clinton for instance
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5822
<b>Person ID</b>	1264755
<b>Full Name</b>	Jane Edmonds
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5828
<b>Person ID</b>	1264752

<b>Full Name</b>	Chris Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>As a citizen member of the Herts CC panel I had commented previously on the Herts Sustainability proposals. Very keen supporter of encouraging sustainable development in Dacorum but am aghast at what has been proposed in the Local Plan.</p> <p>None of the proposed developments can be described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.</p> <p>No account is taken of the current geographic layout of Berkhamsted and surrounding areas and the valley effect creating traffic pinch points and higher pollution. The towns of Berkhamsted and Tring are already stressed when it comes to environment and I see no stronger leadership in terms of lowering carbon emissions in this plan, such as mandating no gas boilers more renewables like heat pumps, less road traffic more cycle paths and so on.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5854
<b>Person ID</b>	1264768
<b>Full Name</b>	Paul Shepherd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	No

* No	
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5874
<b>Person ID</b>	1264354
<b>Full Name</b>	Juliet Penaliggon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Just looking at the map and the proximity of the Chiltern beechwood SAC and AONB and the amount of green belt disappearing within the proposed development plan, how can the level of the development be called sustainable?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5925
<b>Person ID</b>	1264785
<b>Full Name</b>	Thomas Lloyd-Evans
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	The proposed growth is not sustainable and would be extremely damaging to the green belt. It is entirely unjustified and would impact on the local environment and residents' health.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5965
<b>Person ID</b>	1151388
<b>Full Name</b>	Mrs Aileen MCVEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p>

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5976
<b>Person ID</b>	1264797
<b>Full Name</b>	Robert Diehl
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	The growth proposed is neither sustainable nor respecting the environmental role of planning. Nothing in the section can be described as "fully evidenced and justified" as required by the NPPF to remove Green Belt designation.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5991
<b>Person ID</b>	1264030
<b>Full Name</b>	Sean Collier
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Whilst I agree that development should improve economic, social and environmental conditions, I am skeptical of building on green belt land and how it can possibly improve environmental conditions.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5992
<b>Person ID</b>	1264809
<b>Full Name</b>	Sue Selfe
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

\* Yes

\* No

**Sustainable Development in Dacorum**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS5994
<b>Person ID</b>	1264763
<b>Full Name</b>	Corran Griffin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	16,500+ new houses is an over provision and is based on out of date (2014) ONS data. Estimates from the 2018 ONS survey should be used instead.

The sheer scale of the proposed developments will have a significant and detrimental impact on the natural environment. Not enough innovative thought processes have gone into looking how to redevelop current (tired) town centre sites. These should be explored exhaustively before building on even an inch of the green belt.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS5996

**Person ID** 1145998

**Full Name** Mrs Pauline Hughes

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** There has been previous examples in Hemel Hempstead of developers 'playing the green and sustainable card' without proper investigation and validation e.g. automatic car parking underground which would not have enabled electric car charging in situ and not suitable for any resident who needed a van for their job. or had small children.  
Traffic reports are provided by the developer and have been found to be skewed in their favour with inaccurate figures and no understanding of the heavy traffic flow in HH.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS5999

**Person ID** 1264796

**Full Name** Patrick Hughes

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>The target or over 16000 new homes is far too high., latest projections are only IRO 350 In Dacorum we do not need or require that huge number. This will simply provide new homes for people from outside the area and put additional burdoen on the infrastructure.</p> <p>High rise developments will simply provide future slums.</p> <p>What we need are houses, why is it that all new development in Berkhamsted is houses yet in Hemel Hempstead itself you are advocating high rise. Families need a garden on a balcony. If it is good enough for Berkhamsted it is good enough for Hemel.</p> <p>. In Dacorum we do not need or require that number. This will simply provide new homes for people from outside the area and put additional burdoen on the infrastructure.</p> <p>High rise developments will simply provide future slums.</p> <p>What we need are houses, why is it that all new development in Berkhamsted is houses yet in Hemel Hempstead itself you are advocating high rise. Families need a garden on a balcony. If it is good enough for Berkhamsted it is good enough for Hemel.</p> <p>In Dacorum we do not need or require that number. This will simply provide new homes for people from outside the area and put additional burdoen on the infrastructure.</p> <p>High rise developments will simply provide future slums.</p> <p>What we need are houses, why is it that all new development in Berkhamsted is houses yet in Hemel Hempstead itself you are advocating high rise. Families need a garden on a balcony. If it is good enough for Berkhamsted it is good enough for Hemel.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6014
<b>Person ID</b>	1264511
<b>Full Name</b>	Marianne Ball
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<p>Yes / No * Yes * No</p>	<p>Yes</p>
<p><b>Sustainable Development in Dacorum</b></p>	<p>The local plan - in particular for Berkhamsted - does not align with the 'environmental role' quoted here as the plan would damage the natural, historic, and built environment and actively increase pollution, particularly air pollution. Ambitions around sustainable transport are not realistic, due in part to the topography of the area.</p> <p>2.14 refers to concerns around "the ability of the roads to accommodate high levels of housing growth and to tackle climate change we need to significantly reduce harmful emissions and particulates from transport and at the same time greatly improve local air quality. Therefore, <b>new development will need to be located in places</b> which have excellent access to jobs, shops, services, can quickly and <b>easily be reached by sustainable public transport and benefit from high quality walking and cycling infrastructure.</b>" The Berkhamsted sites in particular BK01 do not fulfill this criteria and cannot be improved to do so sufficiently. The topography combined with high car ownership of residents and limitations of the town and road network means the outcome will simply be a massive increase in traffic that the town cannot cope with.</p> <p>The vision (2.2) says: "A central thread of the Local Plan is to plan for a low-carbon future in which carbon emissions and other greenhouse gases are reduced". The current plans will only <b>increase carbon emissions</b> particular through increased traffic and congestion in Berkhamsted. This risks making the centre a polluted, traffic filled, unpleasant place to be, impacting also on the businesses this plan claims to support.</p> <p>Berkhamsted cannot sustain this growth without significant damage to the health and wellbeing of the community, increased pollution and congestion and a demolition of the character of the town, effectively building towards a merger with Hemel Hempstead.</p> <p>Cramming in 850 homes in a site at the top of a steep hill (BK01 - but the other BK sites are in the same position), will add <b>1000's of car journeys</b> and add to the problems of an already congested Berkhamsted, with risks around air pollution, the town sitting as it does in a valley. It is massive disregard for reality to suggest that people will walk / cycle - has anyone involved in producing this plan walked up Swing Gate Lane?! Do you imagine that families will walk / cycle into town as a rule instead of hopping into their 4X4s?</p> <p>The improvements suggested in the Berkhamsted and Tring Sustainable Transport Study are barely sticking plasters and the author accepts that there are limited options. The study says: "Development will lead to an increase of trips both within and beyond the town. It is therefore imperative to ensure that <b>as many of these trips as possible</b> are made using sustainable transport options". [The bit I've highlighted in bold is simply not going to happen].</p> <p>"In Berkhamsted, development is proposed around the southern edges of the town [...]. Given the town's steep topography, this will lead to issues for future residents accessing the town centre. This could exacerbate further the town's reliance on the car and dissuade use of more sustainable modes. In some areas where development is proposed, there is currently little or no bus services, footways or cycle routes."</p> <p>"Further development in Berkhamsted is also likely to increase dependence on the A4251 which runs through the centre of the town, increasing congestion and journey times"</p>

"It would not be feasible or cost effective to address all of the issues identified. Some characteristics of the town, most notably its location within a deep valley and more historic and physically constrained network of roads, will continue to create barriers for people making trips on foot or by bike as there may be fewer opportunities to introduce high-quality interventions."

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS6021

**Person ID** 1264772

**Full Name** Adrian Slade

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** My main focus in answering this relates to Tring as this is the area I am most familiar with. The plan states that '*Tring will accommodate growth of at least 2,700 new homes.*' This is simply not sustainable, and likely in breach of the heart of NPPF which is 'sustainable development'. It represents at least a 55% increase in the size of Tring, by far the largest urban growth across Dacorum envisaged by the Plan. It is significantly above the evidence-based proportion for Tring based on population growth through the Plan period as amended by Government 'affordability' formula (evidenced in the September 2020 SW Herts Local Housing document). In addition, the Plan presents no evidence that development will enhance the town centre or strengthen its function as a key market town in the Borough.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS6068

**Person ID** 1264847

**Full Name** Cheryl Newcomb

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The number of homes is based on out of date data and does not accurately reflect the number of homes needed in the borough.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6073
<b>Person ID</b>	1264816
<b>Full Name</b>	Christopher Nicholls
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Reading through the document this does not appear to be sustainable at all.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6093
<b>Person ID</b>	1264855
<b>Full Name</b>	Joanna LARKINSON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6102
<b>Person ID</b>	1264834
<b>Full Name</b>	Ilina Jha
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Proposals and sites are not sustainable.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6148
<b>Person ID</b>	1264872
<b>Full Name</b>	Ben Penaliggon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	Just looking at the map and the proximity of the Chiltern beechwood SAC and AONB and the amount of green belt disappearing within the proposed development plan, how can the level of the development be called sustainable?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6183
<b>Person ID</b>	1263462
<b>Full Name</b>	Bourne End
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>Because sustainability, mentioned in DM22.5, will be assessed on its merits with only expectation of compliance rather than the force of regulation, there is obvious scope for avoiding sustainable development requirements, leaving that assessment in the hands of planning officers who do not enjoy the confidence of our community on the basis of long term failure even to enforce conditions they themselves proposed on developments in our village.</p> <p>It is particularly relevant that our community had an employment site which was split into employment and housing and now it is proposed to replace the housing part "lost" with a further removal of green belt land. This seems unreasonable strategy.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6195
<b>Person ID</b>	1261819
<b>Full Name</b>	Alex Rathmell
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6260
<b>Person ID</b>	1264884
<b>Full Name</b>	Max Ansell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><b>Economic</b></p> <p>The Plan proposes to support retail development, whereas this is now recognised as an area in decline across the country and not a sustainable source of economic development.</p> <p><b>Social</b></p> <p>The plans for Northchurch (classified as part of Berkhamsted West) do not take account of the distance to local services</p> <p><b>Environmental</b></p> <p>The local plan undermines Dacorum's goal to minimise and manage the requirement for development on Green Belt - almost all the development plans for Berkhamsted are on Green Belt land, ignoring Brownfield sites such as Egerton Rothsay school, and pushing for an excessive number of houses and development</p>

Dacorum states that it 'will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.

However, the Local Plan for Northchurch does not support this strategy. Northchurch village is not recognised as a separate community in the plan but classified as part of Berkhamsted West. Yet it is not part of Berkhamsted market town, rather a village with numerous actively farmed green fields on Green Belt land and very rural in nature. The village is quiet with a local shop/post office and has a lot of older residents. The local greet each other when walking past. The proposed plan does not 'reflect its role and character' as promised for villages.

The plan proposes investment in open space rather than preserving the open space we already have on Green Belt land with established and well used footpaths

The plans for Berkhamsted West rely on car ownership and car usage as there is no access to passenger transport, thus increasing pollution, congestion and local traffic including from idling by St Mary's primary school.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS6304

**Person ID** 1264908

**Full Name** Henry Smart

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum**

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS6310

**Person ID** 1264916

<b>Full Name</b>	Kathryn Spall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I do not believe that the growth proposed is in any way sustainable and there is no evidence to justify the amount of Green Belt to be built on.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6321
<b>Person ID</b>	494770
<b>Full Name</b>	Mr John Borton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I do not see sufficient explanation in the Plan as to why DBC is interpreting housing numbers from the Government's Standard Methodology as a 'target' that justifies development on Green Belt land. Neither do I see sufficient justification for the 'exceptional circumstances' justification for development in Green Belt designated areas. The Government has stated on many occasions, but most recently on 16/12/2020 in its response to the White Paper consultations, that "meeting housing need is never a reason to cause unacceptable harm to such places" [protected landscapes and Green Belt]. So why is DBC proposing to change Green Belt designations to build more houses?</p> <p>The whole Strategy for Growth is based on pre-Covid-19 assumptions of working and commuting practices and the logic of where to locate additional housing. Many of the assumptions on which the Draft Local Plan is based are now out of date. Fewer people need to be commuting into London to work in offices and more people will now be working from</p>

home which for many can be anywhere with good internet access. Surely the pressure for additional housing in Berkhamsted has now been **reduced** by Covid-19 and the projected numbers should now be revised downwards?

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS6336

**Person ID** 1262933

**Full Name** James Cunningham

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

No

**Sustainable Development in Dacorum** I am totally unconvinced that the plan is sustainable in a world where we need to be carbon neutral.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS6348

**Person ID** 1264928

**Full Name** Nicola Simpson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Sustainable Development in Dacorum</b>	I believe that this proposal contradicts the statement " <b>An environmental role</b> – <i>contributing to protecting and enhancing the natural, historic and built environment,</i> " and in particular is damaging to the natural environment in areas of green belt and areas of outstanding natural beauty.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6358
<b>Person ID</b>	1264946
<b>Full Name</b>	Shaun Pope
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6359
<b>Person ID</b>	1264936
<b>Full Name</b>	Jane Cracknell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6360
<b>Person ID</b>	1264914
<b>Full Name</b>	Malcolm HULL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	We welcome the commitment to Sustainability
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6388
<b>Person ID</b>	1264964
<b>Full Name</b>	Philip Heaphy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<i>We are concerned about the interaction between housing, employment and commercial activities having regard to the effect of the pandemic on overall plans. It is likely that remote working will become more prevalent and there will be less need for London workers to live in Hertfordshire, including Dacorum. This reduced demand for housing can be met by the use of brownfield sites rather than on Green Belt land, particularly if there is also a reduced demand for local office and retail space following the pandemic which would allow this space to be converted to residential housing.</i>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6413
<b>Person ID</b>	1264949
<b>Full Name</b>	Evelyne Brocas
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The local plan focuses on building on Green belt land, not minimising it, instead of cloaking at brownfield sites.</p> <p>There aren't many work opportunities in Berkhamsted so all these new people would have to drive to other towns for work - it would be a better strategy to build houses in urban centres where there are work opportunities and would be better for Dacorum's environmental strategy too.</p> <p>Although Dacorum is looking for balance in urban growth, the houses need to be built in areas where there are jobs and already a lot of services and amenities. These are very limited in Northchurch - not a place to build, it makes much more sense to continue protecting green belt and extending larger conurbations such as Hemel Hempstead where there are jobs and good transport links</p> <p>Dacorum has Northchurch down as Berkhamsted west but we are a separate countryside village of green fields and mainly old people - only 1,500 population and an extra 400 houses on green belt land would create an imbalance in itself. Instead of building a new park, let us keep the green fields we have always had and are typical of a village in the Chilterns - part to our wonderful nature</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS6426
<b>Person ID</b>	1264969
<b>Full Name</b>	Gregg McAlister
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I don't believe so much green belt development is either in keeping with current government policy which was announced in December 2020 nor in any way representative of a sustainable policy.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6448
<b>Person ID</b>	1264982
<b>Full Name</b>	Rachel Heaphy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<i>We are concerned about the interaction between housing, employment and commercial activities having regard to the effect of the pandemic on overall plans. It is likely that remote working will become more prevalent and there will be less need for London workers to live in Hertfordshire, including Dacorum. This reduced demand for housing can be met by the use of brownfield sites rather than on Green Belt land, particularly if there is also a reduced demand for local office and retail space following the pandemic which would allow this space to be converted to residential housing.</i>

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6449
<b>Person ID</b>	1264971
<b>Full Name</b>	Louise Watson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>—The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.</p> <p>— This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.</p> <p>— Northchurch has not been recognised at all. It has been called West Berkhamsted instead.</p> <p>— The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.</p> <p>— There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6453
<b>Person ID</b>	1264951
<b>Full Name</b>	Chris Perks
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. The proposed plan as presented is largely silent on new sources of water supply and on how it will protect the three designated chalk streams in the borough (the Gade, Bulbourne and Ver).</p> <p>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>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6477
<b>Person ID</b>	1264970
<b>Full Name</b>	Frankie Mitchell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	<p>I strongly feel that the scale of development in Hemel fails to measure the impact on the quality of life of increased traffic, overcrowding, loss of green spaces, strain on infrastructure, increased pollution and possible related social problems - crime and mental health issues.</p> <p>I believe a more imaginative and resourceful approach needs to be taken when identifying industrial areas to keep them away from housing developments and green space. For example, using disused farm and agricultural buildings.</p> <p>Where industrial development is planned there needs to be attention to matching rural architecture and landscaping to minimise visual blight. Use green materials for buildings not silver.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6497
<b>Person ID</b>	1227391
<b>Full Name</b>	mrs caroline shaughnessy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Whilst I support and understand the need for the growth strategy, and for the most part it looks a well planned and thought out vision of an ideal Borough. Unfortunately the reality is there are some areas that need to be highlighted that may seem trivial in the great scheme of the whole strategy but need to be addressed . I have highlighted areas where mistake have been made and are of grave concern to the local residents where I live so I have commented on them on thir behalf also. They are elderly and vulnerable adults who would not have been able to access and read the proposals</p> <p>The development around London Road and Durrants Hill Road is a prime example of development disregarding consultation and the fact that it sits in the exceeded level of pollution AQMAs, yet you have now encouraged over 200 extra vehicles to use the already over congested and ineptly designed area of town.</p> <p>There was consultation, but only a few residents were contacted before it was too late, and any objections or questions were rejected or ignored.</p>

This area of town is high polluted and congested already, yet development is ongoing and continues to be in the plan without proper infrastructure to divert traffic from the residential areas and highways causing increase pollution.

I have attempted to read the parking document that has been commissioned to run alongside the development of residential property parking allocation. It is based purely on assumption and comment that has no real evidence to support the reality that exists.

It will be many decades before all diesel/petrol vehicles cease to be on the roads.

Public transport will need to be regular, clean and inexpensive before people will forego the need for a vehicle of their own.

Providing cycle storage will not deter people from owning a vehicle.

Not providing adequate parking spaces for the size of the property will not encourage people to give up on owning a car.

Fact : Parking is one of the major causes of Anti-Social behaviour and neighbour disputes, which can result in a devastating spiral of problems which end up with many agencies spending time, money and effort in resolving and at worst breakdown in communities and ultimately can end in death.

The one thing I would comment on development is provide adequate (Free) parking spaces for the size of the property. It must be one space for the number of bedrooms plus one more for visitors. This would make the areas more spacious and create a better community feel allowing for children better areas to play outside and integrate with one another again creating adhesion to build better communities. This in turn breeds tolerance and understanding and is a great prevention of criminality. After all isn't this what we want for the Borough to have a great sense of community self-worth, reduced crime all go towards encouraging businesses and prosperity. A Place that good teachers want to teach, better prospects for youngsters, more business to offer our youngsters employment .

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6524
<b>Person ID</b>	1264920
<b>Full Name</b>	Anna Wellings Purvis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

**Sustainable Development in Dacorum** Sustainable development would offset pollution by things like raised walkways, perhaps vertical gardens and public transport to offset increased cars on the roads.

It's nice that Tring is getting more social and sports facilities but Hemel Hempstead's provision of these has fallen over the past few years, as have our hospital services. As the population will be substantially larger than in 2015 we do need the community services to be funded as part of the build, and this could be part of the deal with developers or indeed with the Government as you appear to be allocating over target.

Dacorum needs more council housing, I do not see the 2020-21 figures published but as of a few years ago Dacorum had 5,000 families on the waiting list and the UK was failing to replace council homes sold (within 3 years).

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS6544

**Person ID** 1263380

**Full Name** Martin Warden

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum**

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS6547

**Person ID** 1264923

**Full Name** Ken Douglas

**Organisation Details** Secretary  
 TRING IN TRANSITION

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><b>Policy SP1 ‘Sustainable Development in Dacorum’, section 4.2 and 4.3</b></p> <ul style="list-style-type: none"> <li>• Three priority areas are defined ‘<i>economic, social and environment</i>’ The latter however is NOT well defined in the Plan. I am concerned that Herts Sustainability Strategy and HCCSP priorities are not explicitly included for example. There is a lack of explicit statement in support of this goal in the plan and – tellingly – there are NO areas (except for Ashridge) earmarked for improvement.</li> <li>• Of the three key areas – ‘<i>economic, social and environment</i>’ – the latter is the least well defined in the Plan. We have a concern that specific targets from the Herts Sustainability Strategy and HCCSP priorities are not explicitly reflected in general or that a robust enough approach is being taken on building standards or energy efficiency. There should be reference to, for example, stringent building regulations, requiring orientation of housing to allow for thermal solar and solar PV installations as part of all new builds, alongside ground and/or air source heat pump electricity generation, but these are not apparent anywhere in the plan.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6552
<b>Person ID</b>	1265007
<b>Full Name</b>	Duncan Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I fully support the comment from BRAG that 'nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.'

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6614
<b>Person ID</b>	1265006
<b>Full Name</b>	Tracy Bownes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I do not see how the existing proposal to remove greenbelt land adjacent to AONB is in accordance with NPPF, and therefore do not interpret the proposals as sustainable.</p> <p>The planned development will create more dwelling than employment opportunities - placing either further pressure on local unemployment or on the already fragile rail links into London.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6641
<b>Person ID</b>	1263500
<b>Full Name</b>	Jessica Haigh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	ustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning. Building on green belt land is never justifiable, especially when there are plenty of brownfield sites to consider first.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6646
<b>Person ID</b>	1265019
<b>Full Name</b>	Yvonne Brener
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	This is a load of waffly coroprare speak...if you actually believe any of this , why are you building on green belt land. Why did you build a massive car park in berkhamsted. What are you doing about a decent bus service
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6674
<b>Person ID</b>	1261827
<b>Full Name</b>	Ian Brener
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

<b>* No</b>	
<b>Sustainable Development in Dacorum</b>	<p>This is an awful way of getting a response from ordinary citizens. The document is over long and unreadable. It is ridiculous and irresponsible that this is happening during such an unprecedented crisis for our country. I can't believe that this is legitimate. It is extremely confusing and makes commenting difficult.</p> <p>This section is vague. Berkhamsted is already not meeting the needs of the population in schooling and health provision. By adding more housing the health of the town will not be sustainable. This strikes me that this is about developers, money making and not the people who live here.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6713
<b>Person ID</b>	1265036
<b>Full Name</b>	Tom Burrows
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> <b>* Yes</b> <b>* No</b>	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6740
<b>Person ID</b>	1265033
<b>Full Name</b>	James Heath
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>This continues from the last comment box.</p> <p>Tring school is already very large any new developments will only add further pressure here and the students will not receive the personalised attention they need for their development.</p> <p>Also linked to sustainability is the disruption, traffic, noisepollution and air pollution that will be created by the proposed developments.</p> <p>To be sustainable 'you have to meet the needs of the current population and protect them for future generations', these proposals do not meet the needs of the residents now. Too much disruption, poorer quality of life and reduced happiness are not sustainable for the current population.</p> <p>Tring is a small market town, these proposals will increase its size by over 40% this again is not sustainable for the town. The town itself would be completely changed, no longer small, no longer peaceful etc. If I had wanted to live in a large town, I would have bought a house in Hemel or Watford!</p> <p>a</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6754
<b>Person ID</b>	1265026
<b>Full Name</b>	Sarah hughes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	Surely there is a the need to revise the plan as government policy changes to develop the north over the south of the country, as i understand it this has already changed since this document was published
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6769
<b>Person ID</b>	1265059
<b>Full Name</b>	Paul Austin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6779
<b>Person ID</b>	1265079
<b>Full Name</b>	Darly Rattigna
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	Land prices are high in berkhamsted. therefore the houses that will be built will as a result be expensive, and therefore those living there will work in london as that is where people can arn the high wages to afford these houses. the edge of town / top of a hill location of the South berkhamsted site means that those London workers will drive to the station. that is for a 2 adult household a potential extra 3200 car journeys a day, which is not environmentally sustainable (each adult travelling to and back from the station by car, 800 units proposed)
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6788
<b>Person ID</b>	1265072
<b>Full Name</b>	Peter Barker
<b>Organisation Details</b>	Me
<b>Agent ID</b>	1264829
<b>Agent Name</b>	Peter Barker
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	This section is so general that it carries little real meaning.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6797
<b>Person ID</b>	1265081
<b>Full Name</b>	Caitlin Neale
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I don't feel that the evidence provided demonstrates that truly sustainable development is being proposed. Development within greenbelt would be a backwards step. When considering the scale of the development and the need for infrastructure to support the increased population and environmental impact of this (beyond simply the housing development itself.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6806
<b>Person ID</b>	1265063
<b>Full Name</b>	Richard Scott
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Nothing in this section can be remotely described as "fully evidenced and justified" as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning. You mention that sustainable development is central to the planning system, but the number of dwellings and building on Green Belt land shows a complete disregard for sustainable growth and the underlying impact on the environment. Your reference to 'enhancing the natural, historic and built environment..' is again not evidenced in the attached. The number of dwellings you propose to build will completely ruin a number of local/historic towns in the borough.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6897
<b>Person ID</b>	1265074

<b>Full Name</b>	Stephen Wilson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I support the sustainable development principle. However Policy SP1 is written in such a complex way that I do not think it fully supports the principle. Do you or do you not support the principle?
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6915
<b>Person ID</b>	1265105
<b>Full Name</b>	Jonathan Tay
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6944
<b>Person ID</b>	1265039
<b>Full Name</b>	Michael Lelieveld

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Further to my comment at Section 3, I cannot see how the scale of development proposed in Berkhamsted contributes to sustainable development. There has been considerable development already in Berkhamsted in the last 20 years. The biggest development recently has been Bearroc Park on Shootersway (2 phases). The developer (Taylor Wimpey) appear to have used bog standard building techniques. They have not provided a single solar panel or heat pump across their 2 phases of development, and do not appear to have used any triple glazing. This is not environmentally sustainable construction. Nor do they appear to have provided any new or upgraded infrastructure to the town or any new public spaces or amenities. If all future developments are conducted in the same isolated and piecemeal fashion then the already strained infrastructure in Berkhamsted will no longer cope with the increase in housing, people and traffic - especially at the levels intended in the Strategic Plan.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6945
<b>Person ID</b>	1265114
<b>Full Name</b>	Kirsten McGregor
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Having only recieved formal notification from the council 4 days before the deadline I can't agree with this from a moral point of view. Residents should have had far more notice to digest all the information.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6948
<b>Person ID</b>	1265116
<b>Full Name</b>	andrew Koutsou
<b>Organisation Details</b>	Me - resident
<b>Agent ID</b>	1265101
<b>Agent Name</b>	andrew koutsou
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Yes namely the social role and environmental role in regards to your proposed builds in tring.</p> <p>Social role - tring is a small town - it has the feel of small town and as such has a very close knit community. the amount of houses proposed in nearly on a par with berkhamstead (which is a city) - in this role you are completely desimating the feel of the local community. The town will be overcrowded - there is no healthy aspect to this. You want to build affordable housing - but is this at the cost of losing what makes are small town and villages retain their identities.</p> <p>Environmental role - this links in with this. In tring your proposed development is on fields and supposed greenbelt land. Our wildneress around small towns should be maintained for everyones health and wellbeing. The beautiful views looking to tring from pistone hill and ivinghoe will be lost. The historic natural environment is widely damaged by the amount of proposed housing. Which runs into the 1000's in tring.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6953
<b>Person ID</b>	1265088
<b>Full Name</b>	catherine Hay
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>There is nothing sustainable about the planned development. the infrastructure , even with the proposed improvements, could not support the number of new dwellings.</p> <p>The plan would put extreme strain on the water supply in the area and damage the areas chalk streams.</p> <p>The loss of green areas , specifically Berkhamsted and Northchurch will have huge impact on the physical and mental health of residents. Northchurch cannot be treated as an extention of Berkhamstead, it is a separate community, with its own needs.</p> <p>Since the scale of the development is unnecessary, this cannot be forgiven...the loss of wildlife habitat is irreversable, and with the current climate crisis , this should always be the priority</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS6961
<b>Person ID</b>	1263321
<b>Full Name</b>	TSEL Secretary TSEL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>With reference to p31 Policy SP2 – Spatial Strategy for Growth 3c: there doesn't appear to be any detail at all anywhere in the entire Consultation documentation that sets out the size, scale and composition of the open space and sports facilities that “Development” will provide investment into.</p> <p>At a minimum, these sorts of details should be provided in parallel with the debate about whether there should or shouldn't be any new housing and where that should be built.</p> <p>The same applies to p40 Policy SP4 – Delivering the Housing Strategy 1k: where there is no definition of how much land for “other facilities” there will be and what those other facilities will be.</p>

In relation to **9 The Retail and Leisure Development Strategy:**

- p46 9.9 - Tornadoes disagrees that the Indoor Sports provision in Tring is sufficient. DBC Leisure Facilities Strategy May 2019, clearly states on p5 that Indoor Sports provision for Futsal, Netball, Handball and Basketball is non-existent. Tornadoes own demand for an Indoor Centre enabling multiple Indoor Team Sports is the equivalent of 4 Netball / Futsal Courts alone.
- p48 – it appears that Tring Town Council does not yet know that it is responsible for seeking the delivery of a new neighbourhood centre as set out in 4c.

In relation to **10 Delivering the Infrastructure to Support Growth:**

- p49 – given the extensive scope of what Infrastructure covers and the fact that only a draft was available after the start of the Local Plan consultation, Tornadoes considers that a separate consultation, just on the IDP should be conducted by DBC ahead of the submission of the Plan for Examination. Tornadoes would like to ensure that what is proposed for Tring is documented in sufficient detail that there can be no subsequent compromising on Sports & Leisure provision in negotiation with developers.
- p50 **Policy SP7 Delivering Infrastructure 4a** – Tornadoes would seek confirmation from DBC that Sports Facilities provision in Tring is deemed critical, essential and required infrastructure.

In relation to **11 Neighbourhood Planning:**

- p52 11.5 – Tornadoes has encouraged Tring Town Council to take the responsibility for developing a neighbourhood Plan for Tring. We look forward to contributing to this critical input to the future Local Plan.

In relation to **12 Monitoring and Review:**

- p54 12.2 – whilst DBC has considered the potential impact of the South West Herts Joint Strategic Plan, there is no evidence that any consideration has been given to the massive new developments surrounding Tring already underway in Aston Clinton, Wendover and Pitstone, or the similarly massive new proposals being lodged in recent weeks.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7003

**Person ID** 1262099

**Full Name** Chris Taylor

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>Dacorum's Strategy is based on out-of-date projections that do not reflect a true picture of housing demand. Since the projections were made in 2014, significant social and economic changes have reduced the need for dwellings in Dacorum.</p> <p>Since COVID struck the world has changed and there is a sizable move to a permanent shift to working from home for those who can and the increased utilisation of online shopping and delivery to fulfil retail demand. The answer is not to build new retail outlets.</p> <p>In addition, some of the sites proposed will actively damage the Area of Natural Beauty (AoNB) and I've found that nothing in this section can be remotely described as "fully evidenced and justified" as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7035
<b>Person ID</b>	1263561
<b>Full Name</b>	Alexander Bhinder
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	Too late to elaborate.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7052
<b>Person ID</b>	1265129
<b>Full Name</b>	Karen Foxwell-Moss

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Removing Green Belt designations requires full and justifiable evidence of exceptional circumstances. These exceptional circumstances have not been fully evidenced and justified as per NPPF requirements. The growth proposed is neither sustainable nor does it respect the environmental role of planning. The proposed development will forever change the very essence of the towns and there is no justification for such a change.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7066
<b>Person ID</b>	1265133
<b>Full Name</b>	Sarah Storey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Please see comments above.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7068
<b>Person ID</b>	1265144

<b>Full Name</b>	Michael Williams
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7070
<b>Person ID</b>	1265127
<b>Full Name</b>	Jason Foxwell-Moss
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	There is simply no evidence supplied to justify building on green belt at such scale.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7160
<b>Person ID</b>	1261685
<b>Full Name</b>	Ian Edwards

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I'm not convinced that this plan, particularly for Tring, goes anywhere near to prioritising the environment. Building on green belt land, as a priority over other brownfield and potential change of use sites, would be a disaster for our town.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7172
<b>Person ID</b>	1265154
<b>Full Name</b>	Beth Williams
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I do not believe that a wholly expected increase in population size and housing need meets the 'exceptional' test for the release of greenbelt land for building.  There is insufficient consideration of brownfield sites throughout.  Housing need can be met in the north west of the Borough without encroaching on greenbelt land. I do not believe the reasons given for not pursuing this option are sufficient.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7185

<b>Person ID</b>	1146005
<b>Full Name</b>	Mr Nick Hollinghurst
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>1. In terms of land use I do not see the proposals as sustainable. Far greater densities of development have recently been achieved and the future development densities envisaged are very low. As a consequence a far larger areas of Green Belt have been taken than necessary - especially in Tring. Gross densities are 8 dwellings per ha in North Hemel Hempstead HH01, 12/ha in East of Tring TR03, 13/ha on Dunsley Farm TR01.</p> <p>2. The "Garden Communities" in Hemel Hempstead look very nice but cover productive farmland and are a very inefficient use of land.</p> <p>3. It could, in the light of the above, be said the the cost of these "Garden Communities" is borne by Tring in the form of loss of Green Belt and damage to the setting of the AONB - visited by people from all over the country.</p> <p>4. The Green Belt areas under consideration in Tring and Berkhamsted are different in character from those surrounding Hemel Hempstead. The Tring and Berkhamsted Green Belt areas abut the AONB and therefore qualify as "settings" of the AONB. In Hemel Hempstead, apart from a length of a few hundred metres of HH01 this is not the case.</p> <p>Dunsley TR01 (37 ha) abuts the AONB on 2 of the 3 sides of this triangular site and will be clearly visible will be clearly visible from a large area of the AONB, especially from Wigginton, Tring Park and Aldbury.</p> <p>New Mill TR02 (15 ha) and East of Tring (120 ha) are effectively one major development which abuts the AONB to the north-east and the south. They will be clearly visible from Pitstone Hill and Aldbury and along the crest that the Ridgeway Path follows.</p> <p>NPPF paragraph 115 requires that in any decision "great weight should be given to conserving landscape and scenic beauty" in AONBs. This applies not only to developments proposed within an AONB but <b>if proposed in its setting such that the AONB would be affected.</b></p> <p>Because the Chilterns AONB is set on a scarp and the upland plateaux of the Chiltern Hills it commands views over the surrounding lowlands (its "settings") which will be substantially altered visually to a degree that would damage and detract from the adjacent AONB.</p> <p>I have found no evidence of any adequate consideration of these points and so the proposals could well be found to be "unsound" by the Inspector.</p>

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7213
<b>Person ID</b>	1264956
<b>Full Name</b>	Caroline Heard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7224
<b>Person ID</b>	1265027
<b>Full Name</b>	Saba Poursaeedi
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The areas for housing growth do not look sustainable for me. Why is St Alabns allaocated housing being build onto Hemel Hempstead? This is unacceptable.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7231
<b>Person ID</b>	1265165
<b>Full Name</b>	Graham Christie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>This consultation has not been widely advertised to the people of dacorum hence the low number of comments submitted. Unfortunately our planning officials seem to be making it as difficult as possible for the local community and residents to comment. They need to remember that they are planning officials most people are not. The sustainability of the strategic plan seems to be anything but sustainable. the dacorum area has 155k people and the strategic plan has its sights on increasing this by as much as 30,000 taking dacorum to circa 185,000 - all without a hospital .</p> <p>The planning officials appear to be wanting to cover up that the land Hemel Hempstead Hospital is built on is owned by the people of Hemel Hempstead not the council and should not be available for selling off but preserved for healthcare purposes for which it was gifted to the people of HH, NOT the council.</p> <p>Hemel Hempstead does not have the infrastructure to to accomodate these increases, and the strategic plan despite its wording does not include any improvements to infrastructure and does not take into account the massive developments proposed on St Albans land to the west of the M1 which is essentially going to adjoin HH not St Albans.</p> <p>The residents of HH should oppose nearly every proposed site that is currently green field and hospital land development and the Local authority should be consulting with the local population in writing to every current household (after all we are the people who live here already) by post with simple support or not questions for each part.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7257

<b>Person ID</b>	1264957
<b>Full Name</b>	Mike Connell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7286
<b>Person ID</b>	1265179
<b>Full Name</b>	JANE DAWSON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7287

**Person ID** 1265179

**Full Name** JANE DAWSON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum** I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been

sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7372

**Person ID** 498146

**Full Name** Mr Clive Freestone

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** I live in Cedar Road, Berkhamsted and am responding to the above.

I wish to register my opposition to the contents of the Plan.

This opposition is based on the factors set out in the statement submitted to the Council by the 'One Voice' alliance.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7379

<b>Person ID</b>	1265369
<b>Full Name</b>	ROB DOUGHTY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I would like to state that I disagree with the number of houses planned in the local plan to 2038.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7441
<b>Person ID</b>	1265383
<b>Full Name</b>	RUTH NEWCOMBE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I strongly object to the proposal of some 3400 new homes to be built around the small peaceful village of Long Marston.</p> <p>Having been a resident of Long Marston for over 17 years now I have seen an increase of traffic through our village that the road system simply can't cope with.</p> <p>The roads are constantly peppered with potholes from large lorries that the roads cannot take and the speed at which traffic travels through is simply not safe.</p>

I live on the cross roads opposite the pub and the amount of cars abusing the long straight roads in and out of the village is ridiculous.

The roads in and out of the village can hardly cope with the lorries coming through on a daily basis up to the airfield, there is categorically no capacity for any more, which a development of this size would bring in spades.

I have seen the village flood numerous times, how can it cope with another 3400 homes??

The school is not big enough to accommodate more children and the parking at school run times is already mad enough.

The village has one small pub, and no other facilities. The church would not be able to cope with extra people either.

The village would be irreversibly changed for the worse, ultimately turning it in to a town.

There simply isn't enough in the area to cope with such a huge development.

It would inevitably devalue all the properties in the village too.

I urge you to consider the lives of the residents of Long Marston and think how it would affect you if this was proposed on your doorstep.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7489

**Person ID** 1265558

**Full Name** CLAIRE AND GORDON HEWITT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>We strongly disagree with the plan for the type and number of additional houses in Berkhamsted and Tring. Although we accept the need for the provision of new properties, the plan is misconceived as a significant amount of green belt will be lost plus the fact that it will put a considerable strain on the current and future planned infrastructure.</p> <p>It appears that the volume of houses proposed in the Berkhamsted and Tring area is disproportionate to the number of new homes in the whole of Dacorum. This proposal needs revisiting in order to get the support of the local community.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7497
<b>Person ID</b>	1265562
<b>Full Name</b>	ALICE WILNE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<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>

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** Sustainable Development in Dacorum

**ID** EGS7509

**Person ID** 1265572

<b>Full Name</b>	DAN STOBBS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<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&amp;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** Sustainable Development in Dacorum

**ID** EGS7514

**Person ID** 1265573

**Full Name** DAVID WARREN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum**

I am writing to express my profound disappointment and to object in the strongest possible terms to the Local Plan as promulgated by the Dacorum Borough Council. Not only are the plans for Hemel Hempstead disproportionately high in terms of numbers of houses proposed but it clearly shows that absolutely no account has been taken of the effect on the environment and the disruption to existing communities by the imposition of this travesty.

With reference to the plan for Berkhamsted, the concentration of proposed development in the Shootersway area, namely the area between existing housing and leisure facilities and the A41 Berkhamsted Bypass will seriously degrade the amount of Green Belt land remaining in and around Berkhamsted. The increase in traffic caused by the development of Bearoc by Taylor Wimpey , which is already having a detrimental effect on the safety of inhabitants, will be multiplied several fold by the proposed development. In addition, further development will place an intolerable strain on schools, services and amenities such as medical practices and care for the aged.

It is quite clear that the Dacorum Borough Council is being unduly influenced by the desires of developers rather than the concern of the people whom they are supposed to represent.,

I look forward to your comments and a redraft of the Local Plan.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7533

**Person ID** 1146073

**Full Name** Mrs Emma Kingham

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum**

I am writing in regards to the proposed plans from DBC and Three Rivers District Council to develop of multiple green belt sites on and around Kings Langley.

The COVID-19 global 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 exception circumstance for removing Dacorum's green belt.

I believe that green belt land such as Rectory Farm helps protect the shape, size and character of towns and villages like Kings Langley and prevents them merging into one another

I also feel your plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home

Your plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses

I feel that we don't have enough water to supply all the extra houses. It is a fact 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.

My final point is that Kings Langley is a village. We pride ourselves on this and the 'village feel' is prevalent. We live here because we love Kings Langley and we're passionate about the area. Please don't turn our village into a town, please don't ruin this wonderful community that you've been so involved in creating.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7569

**Person ID** 1265607

**Full Name** Victoria Hayes

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Sustainable Development in Dacorum** I understand that the borough requires more housing but am not in a position to comment on the scope of the local plan. However I have read in Appendix F of the Dacorum local plan interim sustainability appraisal report appendices -November 2020 that a development of over 3500 houses is being considered on the outskirts of Long Marston.  
In my view there are three main reasons why this is not a suitable site for a development of this size.

Firstly, the surrounding transport infrastructure struggles to cope with the existing number of vehicles. The crossroads in Long Marston becomes congested especially during rush hour and at school times. This is exacerbated by the large vehicles coming through the village en route to and from the airfield industrial estate on Cheddington Lane. This would be the route taken to Cheddington station, the proximity of which is mentioned as a mitigating factor in reducing the number of car journeys. The road into Wingrave is very narrow in places and would not be suitable for a large number of additional vehicles.

Secondly, Long Marston has an ongoing issue with flooding. Much of the village has had several days without mains drainage already this year and two households have been out of their homes since October after a flooding event. Both properties have had water in again since. If much of our surrounding countryside is built on then the volume of water running into the centre of the village is going to increase. The fields hold a lot of water during the winter and are very boggy underfoot.

Lastly, the impact on the local wildlife would be atrocious. Personally I have seen two species of deer, hares and many different insects and birds in this area over the last year. Destruction of their habitat would be an extremely sad loss for Long Marston and the whole of Dacorum.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7588
<b>Person ID</b>	1265617
<b>Full Name</b>	NICCI CORRADO
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<b>We strongly disagree with the plan for the type and number of additional houses in Berkhamsted and Tring. Although we accept the need for the provision of new properties, the plan is misconceived as a significant amount of green belt will be lost plus the fact that it will put a considerable strain on the current and future planned infrastructure.</b>

It appears that the volume of houses proposed in the Berkhamsted and Tring area is disproportionate to the number of new homes in the whole of Dacorum.  
This proposal needs revisiting in order to get the support of the local community.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7619

**Person ID** 1207710

**Full Name** Penny Bennetts

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** 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.  
The three key roles of sustainable development strategy is again admirable but I have many reservations about how much this will be shown in the new developments.  
I suggest that the council takes additional time - in view of the covid pandemic - to reassess particularly the retail and office/industrial areas. It might be fine but it might not as circumstances have changed in business with more people working from home etc

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS7748

**Person ID** 1265780

**Full Name** James McDonald

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>I would like to register the following comments on the local plan.</p> <p>General:</p> <p>Whilst the provision of new housing in the borough is important I have three key concerns. Where developments are given permission for new housing it is well documented that they often do not honour their commitments to affordable and social housing. I urge the council to put in place the most stringent safeguards on this provision for any developments which do go ahead. Secondly, the number of homes provided will result in too great a load on local infrastructure, increase the well known parking problems in the borough, increase pollution levels, pressure on the water table and exacerbate drainage issues. Thirdly, proceeding with all these developments would mean the loss of much needed green spaces, not only for wildlife but for the mental and physical health of the human population. I am concerned that the mitigating greening proposed for each development will not retain enough of this vital asset both in the new developments and those adjacent. Clearly, land occupied by houses - however sensitively- will never achieve the same effects and once it is lost it is lost.</p> <p>Specific:</p> <p>As a kings Langley resident I would like to specifically register an objection to the further development of the rectory farm site (growth area KL02) on the above grounds. I am concerned that increasing the number of houses here from 55 to 200 is far more than the local access can support and such an increase in attendant traffic in the already extremely congested high street will have detrimental effects on the environment, on local businesses and on the character of the historic centre of the village. Furthermore, sites such as rectory farm help to demarcate the village as a settlement in its own right, as well as providing an important green space and carbon sink in a busy area. This is a green belt site and should not be put forward for development.</p> <p>Thank you for taking these comments into consideration.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7793
<b>Person ID</b>	1148738
<b>Full Name</b>	Ian and Claire Field
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7835
<b>Person ID</b>	1265916
<b>Full Name</b>	Susan Edwards
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>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.</p> <p>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:</p>

**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** Sustainable Development in Dacorum

**ID** EGS7863

**Person ID** 1265975

**Full Name** Clare Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7885
<b>Person ID</b>	1265985
<b>Full Name</b>	PAUL ELLERAY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Do you have any specific comments about the sustainable development strategy? —The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements. — This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan. — Northchurch has not been recognised at all. It has been called West Berkhamsted instead. — The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology. — There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS7898
<b>Person ID</b>	1265991
<b>Full Name</b>	NICHOLAS MORGAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>—The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.</p> <p>— This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.</p> <p>— Northchurch has not been recognised at all. It has been called West Berkhamsted instead.</p> <p>— The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.</p> <p>— There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS7932
<b>Person ID</b>	1265997
<b>Full Name</b>	ROSE SHERIDAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

<b>* No</b>	
<b>Sustainable Development in Dacorum</b>	<p>The plan does not build sustainable communities. There is inadequate or no detail as to the standards or types of properties that will be built meeting the needs for zero carbon housing, rewilding, wildlife corridors. Led by developers, the housing proposed does not meet the climate change needs of the 21st century. There does not seem to be sufficient provision to develop local employment provision through office or industry site provision. The local plan says very little about sustaining villages, indeed the plans aim to double the size of Tring and substantially increase the size of Northchurch and Berkhamsted with no consideration of the history, identity or community that is part and parcel of sustaining any community. This is particularly apparent in the approach to the historic village of Northchurch, which appears to be written out and renamed West Berkhamsted.</p> <p>The travel corridors are also unsustainable, where is the public transport provision? How do you propose A41 and west coast line support such a huge rise in traffic? What is the sustainable provision for primary health care and hospital provision for these large communities?</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8077
<b>Person ID</b>	1266049
<b>Full Name</b>	Mike Plowman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
<b>* Yes</b>	
<b>* No</b>	
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8175
<b>Person ID</b>	1266119

<b>Full Name</b>	Helen Whitworth
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>I am writing to express my concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>In particular I am very concerned about:</p> <ul style="list-style-type: none"> <li>- The consultation has been very difficult to engage with and feel that it should have been deferred until lockdown restrictions were lifted.</li> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation including the impact on important chalk streams and wildlife habitats</li> <li>- Over-provision of housing, have you challenged the government on numbers which seem to be at odds with the ONS data. Towns and villages will merge leading to the south east of England being one gigantic urban sprawl. This will lead to increased car use as people will have to travel further to the countryside. Equally increased car use within the town as walking to the shops and station from properties further away becomes more difficult.</li> <li>- The lack of truly affordable housing i.e more social housing at affordable rent. Also better quality housing. as a health visitor I fear that flats with the kitchen in the corner of the living room present an avoidable risk to children and will ultimately be the slums of the future.</li> <li>- Impact on infrastructure and local community</li> <li>- The lack of brownfield regeneration proposals e.g. the land behind majestic wine in Berkhamsted has been empty for years now with no sign of it being used.</li> <li>- Failure to address climate change.</li> <li>- The effects of the pandemic are not yet fully understood and the plan does not address the imbalance of investment between the north and south of England.</li> </ul>
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8187
<b>Person ID</b>	1207825
<b>Full Name</b>	Claire Hobson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<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> <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 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.</p> <p>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.</p> <p>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</p>

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 Dacorum's green spaces forever.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS8215

**Person ID** 1266154

**Full Name** Iain Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** (4): Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. **The growth proposed is neither sustainable nor respecting the environmental role of planning.**

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS8276

**Person ID** 1266168

**Full Name** Lisa McNamara

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	<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"> <li>• Loss of Green belt land within the Chilterns which is an area of Outstanding Natural Beauty</li> <li>• Impact on environment with loss of green space, loss of trees and damage to wildlife habitats</li> <li>• 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</li> <li>• The lack of brownfield regeneration proposals.</li> <li>• Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> <li>• 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.</li> </ul> <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>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8277
<b>Person ID</b>	1266169
<b>Full Name</b>	Sarah Knowles
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	

**Sustainable Development in Dacorum** 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.

The areas of concern are:

- 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.

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.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS8284

**Person ID** 1266170

**Full Name** Philip Hill

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum** 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** Sustainable Development in Dacorum

**ID** EGS8290

**Person ID** 1266171

**Full Name** Patrick and Gillian Wilks

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Sustainable Development in Dacorum** 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** Sustainable Development in Dacorum

**ID** EGS8343

**Person ID** 1266200

**Full Name** ROGER HANDS

#### Organisation Details

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	Section 4.2 What exactly will developers be asked to do which will help deliver the environmental enhancement vision? Who will check if the developers have done what that have said they would in terms of improving biodiversity, and that the enhancements are appropriate and sustainable? For example a developer at a site in Chesham was told that the gabion baskets they we reproping to install along the river bank should be covered in natural material and planted with native species appropriate to a chalk stream river bank. 3 years on the gabions are still uncovered and un-planted. Method The planting of flower meadows is a popular method used to encourage native wildlife but without someone being made responsible for maintenance and re-seeding when necessary these often revert to rough grassland rather than a wild flower meadow... it can take years of appropriate maintenance and re-seeding to establish a self sustaining wild flower meadow.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8357
<b>Person ID</b>	211117
<b>Full Name</b>	Mr Michael Heylin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	Section 4.2 What exactly will developers be asked to do which will help deliver the environmental enhancement vision? Who will check if the developers have done what that have said they would in terms of improving biodiversity, and that the enhancements are appropriate and sustainable? For example a developer at a site in Chesham was told that the gabion baskets they we reproping to install along the river bank should be covered in natural material and planted with native species appropriate to a chalk stream river bank. 3 years on the gabions are still uncovered and un-planted. Method The planting of flower meadows is a popular method used to encourage native wildlife but without someone being made responsible for maintenance and re-seeding when necessary these often revert to rough grassland rather

than a wild flower meadow... it can take years of appropriate maintenance and re-seeding to establish a self sustaining wild flower meadow.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS8371

**Person ID** 1266205

**Full Name** DI HAMMOND

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** Section 4.2 What exactly will developers be asked to do which will help deliver the environmental enhancement vision? Who will check if the developers have done what that have said they would in terms of improving biodiversity, and that the enhancements are appropriate and sustainable? For example a developer at a site in Chesham was told that the gabion baskets they were re-proposing to install along the river bank should be covered in natural material and planted with native species appropriate to a chalk stream river bank. 3 years on the gabions are still uncovered and un-planted. Method The planting of flower meadows is a popular method used to encourage native wildlife but without someone being made responsible for maintenance and re-seeding when necessary these often revert to rough grassland rather than a wild flower meadow... it can take years of appropriate maintenance and re-seeding to establish a self sustaining wild flower meadow.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS8405

**Person ID** 1266232

**Full Name** BARBARA FLINT

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<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 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.</p> <p>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.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8541
<b>Person ID</b>	211354
<b>Full Name</b>	Mrs Laura Sanderson
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Traffic levels through Potten End and Berkhamsted will become far greater as vehicles move between the A41 and the M1/M25. The country lanes leading to and from Potten End are already under severe pressure. Berkhamsted is already a traffic jam during normal times despite the A41 by-pass.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8568
<b>Person ID</b>	1266567
<b>Full Name</b>	CAROLINE SMALES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8656
<b>Person ID</b>	1248896
<b>Full Name</b>	Ashleigh Genco
<b>Organisation Details</b>	Harrow Estates plc

<b>Agent ID</b>	1258542
<b>Agent Name</b>	Samantha Ryan
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Harrow supports the key principles of the sustainability strategy (paragraph 5.2) and agrees that the most sustainable strategy to accommodate the growth required in Dacorum is to focus development in the larger settlements of Hemel Hempstead, Berkhamsted and Tring, providing more opportunities for balanced growth to meet the needs of all communities in the borough.</p> <p>While it is important to ensure that the most efficient use is made of land within the existing urban areas of those settlements, Harrow agrees that a policy of urban intensification would be inappropriate if it were to detract from the existing character of those locations, particularly Berkhamsted and Tring (paragraph 5.5). The borough's aspirations for growth are best achieved through urban expansions of the main settlements that manages landscape and Green Belt impacts while providing opportunities for sustainable growth close to passenger transport, employment and other services and facilities. This is consistent with national planning policy at paragraph 72 of NPPF.</p> <p>Harrow agrees with the findings of the Development Strategy Topic Paper which identifies housing growth as the main driver for change in the borough. The company supports the Council in recognising the benefits that this can bring and also its commitment to meeting the full development needs of Dacorum.</p> <p>Harrow also agrees with the Council's evidence base which shows that growth of sufficient critical mass also enables the integrated provision of key infrastructure, such as schools, roads and community facilities. These can be designed into major developments from the outset, ensuring their early delivery to both support future growth and offer wider benefits to existing communities.</p> <p>Land East of Tring (draft allocation Tr03) is one of only two potential sites in the Growth Plan that are capable of accommodating more than 1000 new homes and of sufficient critical mass to integrate and deliver key infrastructure.</p> <p>Harrow owns or controls all of that site and has prepared a Vision Document containing an illustrative masterplan to show how that land could deliver a sustainable garden suburb for Tring, planned and delivered alongside the adjacent draft allocation at New Mill (Tr02) . Collectively those allocations could provide c.1800 new homes of a wide variety of types and tenures; including first homes, elderly persons accommodation and custom-build housing; a primary and a secondary school, and community and sports facilities all set within an extensive green and blue infrastructure network that connects into the existing community.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS8667
<b>Person ID</b>	1207333
<b>Full Name</b>	Growth Team
<b>Organisation Details</b>	Growth team Hertfordshire County Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8688
<b>Person ID</b>	1266699
<b>Full Name</b>	Ms Carleen Bircham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	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.

Whilst I support the need to increase housing, this needs to be done in a sustainable way and to preserve the greenbelt. The plans to increase housing in the area by 16,600 new homes is completely excessive to what the projected need is. The latest ONS data available projects 6051 new homes by 2038 - 64% fewer than this plan projects. I therefore object to the proposed plans and would like this email put forward to the decisions board.

There is already a high demand for services such as traffic needs, schools and healthcare in the Dacorum area. The plan does not commit to any level of sustainability in its sustainability targets.

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.

**Included files**

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8694
<b>Person ID</b>	1266706
<b>Full Name</b>	Ms Jane Murray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

**Sustainable Development in Dacorum** I strongly disagree with the Local Plan and the number of houses proposed for Berkhamsted which are well in excess of the number quoted by the ONS. The infrastructure cannot sustain such an increase in population and the ensuing traffic congestion and pollution would be most unwelcome.

**Included files**

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8699
<b>Person ID</b>	1266709
<b>Full Name</b>	Ms Jo Waller

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I am opposed to building on green belt it will damage the environment as well as the infrastructure of the town, we have had a substantial building of flats and houses through out Dacorum, we don't have the facilities to go with this like, schools, doctors, dentists and of course a hospital it's in danger of becoming a concrete jungle with all the difficulties that it also brings. Green belt is there to be protected from building on, for us and also the wildlife that uses it also for the carbon footprint we are supposed to be lowering.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS8754
<b>Person ID</b>	1266762
<b>Full Name</b>	LAYLA EVANS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I need to express my extreme concern - and objection to - the proposals contained in the Dacorum Borough Council Emerging Strategy for Growth.  In particular, the huge proposed development in the countryside and the impact this will have on the local Community as well as the Environment.

The overall impact on the environment and infrastructure, including increased traffic congestion, a strain on water supply, and waste water

disposal, will be felt across the whole of Dacorum and further afield.

Specifically, I am extremely concerned about:

- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns
- Beechwoods Special Area of Conservation
- Over-provision of housing
- Failure to address climate emergency issues
- Impact on infrastructure and local community
- Likely water and water waste disposal issues and damage to chalk streams
- 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.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS8809

**Person ID** 1158356

**Full Name** Colin Blundel

**Organisation Details** Planning Officer  
Chiltern Society

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** 5.2 – This paragraph includes a bullet point about minimising and managing development on Green Belt land. It needs to be clear whether this relates to the existing area of Green Belt or the remaining areas of Green Belt once the site

allocations are removed. Either way the strategy must include an objective to reduce land removed from the Green Belt to an absolute minimum and exceptional circumstances must be clearly demonstrated.

5.3 – 5.5 – The Society supports proposals to increase density and heights in urban areas to reduce impacts on the wider countryside. This could include significant developments of flats and starter homes, which require less land take, to reduce the need to expand Hemel Hempstead, Berkhamsted and Tring into the Green Belt. Careful assessment would need to be undertaken in each settlement in relation to building heights. For example, Berkhamsted does not generally have buildings over 3 storeys and increasing that height could harm the character of the settlement.

We would advocate the approach similar to that set out in the Chesham Masterplan which encourages housing development in sustainable locations in the town centre whilst reducing the need for car travel. This can be viewed on the following link <https://cheshammasterplan.org/> This approach could be adapted to make it suitable for Tring and Berkhamsted. In the light of Covid-19 the strategy will need to consider whether there is scope for new uses of town centre buildings arising due to more people working from home and retail businesses closing.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9069

**Person ID** 1267067

**Full Name** KATHRYN BROWN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** Sustainable Development in Dacorum: there is no evidence to show that this development is sustainable or respects environmental issues.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9091

**Person ID** 1267074

**Full Name** Joanne Howe

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9147
<b>Person ID</b>	211352
<b>Full Name</b>	Mr Andrew Sanderson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Yes. I do not believe any of this Plan is sustainable. Nothing in the Plan gives me any encouragement that much serious thought has been given to</p> <p>Water and sewerage which are already inadequate for the area. See CPRE’s analysis. Why is there no mention of the work needed, the money required and the location of the necessary services?</p> <p>Here in Potten End, many residents have cessation of water supplies every summer and very poor water pressure the rest of the time.</p>

There is talk in the Plan of improved transport but again no real proposals of routes, the type of transport or the money required. As the proposed development in Berkhamsted and Tring is way out on the outskirts there is NO chance that people will walk or cycle on the narrow or steep roads in these 2 towns.

To make matters worse the proposed Mass Rapid Transport system in Hemel suggests that traffic coming to and from Tring and Berkhamsted would be diverted from the A414 in Hemel. The most direct route for this traffic goes through Potten End to the centre of Berkhamsted. There is no plan for a new link road from the A41 to the Dagnall Road and the traffic problem would be exported to Potten End village and the centre of Berkhamsted. This is anything but sustainable. One of the aims of Dacorum's previous plans was maintaining its villages as villages, making Potten End a major transport route will ruin any chance of maintaining its village character.

**Included files****Title** Sustainable Development in Dacorum**ID** EGS9221**Person ID** 1267246**Full Name** Mr Keith Buckle**Organisation Details****Agent ID****Agent Name****Agent Organisation****Yes / No** Yes  
\* Yes  
\* No**Sustainable Development in Dacorum** 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.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9229

**Person ID** 1264686

**Full Name** Suzanne Doubleday

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9282

**Person ID** 1267333

**Full Name** JO MURPHY

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9297
<b>Person ID</b>	1267332
<b>Full Name</b>	Nandi Jordan
<b>Organisation Details</b>	Chair Berkhamsted and Tring Labour Party
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9316

<b>Person ID</b>	1267341
<b>Full Name</b>	ANDY WESTWOOD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<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: <a href="https://www.building.co.uk/news/jenrick-abandons-mutant-housing-algorithm-to-focus-on-urban-development/5109569.article">https://www.building.co.uk/news/jenrick-abandons-mutant-housing-algorithm-to-focus-on-urban-development/5109569.article</a>).</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> <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).</p> <p>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).</p> <p>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</p>

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** Sustainable Development in Dacorum

**ID** EGS9407

**Person ID** 1267392

**Full Name** TANYA VERBEEK

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** (4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9430

**Person ID** 1267397

**Full Name** TOM PERRY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Sustainable Development in Dacorum</b>	<p>This email is to express my genuine concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth document. I am particularly concerned about proposed developments in the countryside, green belt and the impact this will have on the community and the environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal will be felt across the whole borough and beyond. Developments on the edge of our town will only encourage further car trips into the town centre and a brand new multi storey car park encourages this!</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9495
<b>Person ID</b>	1267419
<b>Full Name</b>	Eric White
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Regarding Sustainable Development in Dacorum: nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning. The patent falsehoods involved in these claims is shocking, and frankly insulting.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9522
<b>Person ID</b>	1267427
<b>Full Name</b>	Megan Humphreys
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	With regard to the Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9578
<b>Person ID</b>	1267450
<b>Full Name</b>	Mrs Ruth Taljaard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>I cannot navigate your website. It is not well designed. Please find my feedback below - which is submitted BEFORE the deadline.</p> <p>I understand that growth is inevitable, but it MUST be done WELL:</p> <p>If you develop Lock Field, Northchurch then I have the following comments:</p> <ul style="list-style-type: none"> <li>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!</li> <li>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</li> </ul>

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.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9615
<b>Person ID</b>	1151590
<b>Full Name</b>	Lynda Clarke
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	(4) <u>Sustainable Development in Dacorum</u> – I do not see how these proposals fully evidence and justify the removal Green Belt designations. The growth proposed is neither sustainable, aquifers are at compacity and no details are provided about how this will be addressed and will lead to increased car journeys as the location of the development, particularly in South Berkhamsted area are at the top of hills and too far from local services. Building on Green Belt land will fundamentally change and destroy the attractive market towns of Berkhamsted and Tring and dont respect the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9629
<b>Person ID</b>	1151590
<b>Full Name</b>	Lynda Clarke
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9664
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry

<b>Organisation Details</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<b>Chapter 4</b> is entitled Sustainable Development Strategy, and three issues are apparent. Firstly, in a Borough where 85% of the land area is rural, it is unacceptable not to see a rural strategy as part of the Emerging Strategy, to encompass particularly the need to identify and protect natural capital resources, including soils, and demonstrate how rural areas can contribute to climate change mitigation and the promotion of biodiversity across the whole area, and not just in conjunction with development.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9665
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation Details</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	Secondly, the key diagram should be amended to exclude the major proposed greenfield allocations in the Green Belt at Hemel Hempstead, Berkhamsted and Tring which are not justified by current evidence. Thirdly, selective development proposals are shown outside the plan area, including proposals in St Albans which has recently withdrawn its local plan, and proposals for which must be considered speculative at present, but major proposals in other local authorities that now have a formal status are not shown.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9713
<b>Person ID</b>	1267480
<b>Full Name</b>	Paul Townsend
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9754
<b>Person ID</b>	1264414
<b>Full Name</b>	Elaine Ridgway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	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 the proposed new houses. Shops built in previous housing development have remained empty. More houses but no addition retail is difficult to understand. Village school is at capacity and places at secondary school of choice hard to achieve.

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.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9768

**Person ID** 1267525

**Full Name** Anil Mistry

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Sustainable Development in Dacorum**

I am writing to submit my response to the Local Plan. I welcome the opportunity to contribute to this consultation and hope that you listen to my response and to that of other respondents, and look forward to seeing the revised Local Plan once all points raised are properly addressed.

The Local Plan is clearly not fit for purpose for many reasons, with two being foremost.

- 1 The increased housing numbers are based on outdated information, which leads to an unacceptable and irreversible impact on our natural heritage. The Local Plan must be re-drawn based on more recent information and with more

respect for the Green Belt, Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC).

- 2 The Local Plan must define the practical steps necessary to meet the DBC declaration of a climate emergency, and lay out how DBC will contribute to the UK meeting our international legal commitments to reducing emissions. At present, the Local Plan admits to the options being put forward having a negative impact on climate targets, which is the opposite of what is legally and morally required.

The revised Local Plan must be based on evidence that is itself subject to public scrutiny. The current plan relies on aspirational growth strategies and has led to a bias in the plans which must be addressed.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9782

**Person ID** 1267530

**Full Name** Susan Lambiase

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Sustainable Development in Dacorum**

I am emailing to express my serious worries and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, notably the huge proposed development in the countryside and the impact this will have on the community and the environment.

There'll be a enormous detrimental impact :

- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation
- Over-provision of housing
- Failure to address climate emergency issues
- Impact on infrastructure and local community
- Likely water and water waste disposal issues and damage to chalk streams
- 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.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9870

**Person ID** 1267754

**Full Name** DIANE HOLLIDAY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Sustainable Development in Dacorum** I believe there have been suggestions for a more acceptable plan for the future of this area. It is after all incredibly exciting and important project to be involved in.

My personal view is that it is an opportunity to create a plan that could fit the knowledge we now have concerning the need for huge changes to comply with the new environment people will be living in. By this I mean the changes that have to be made to help to prevent Climate change, and the environment and new developments in building etc.

I do not see that that can be done by adding loads of houses in odd spaces around small towns and on Green Belt land.

I was alive after the war when new towns were built that have developed over the years to be communities in their own right fitting in with the needs of the time. Now I would have hoped that houses could be built where there is space and inventiveness to make them fit into the years that the plan is covering between now and 2038 including new designs of roads and paths and cycle tracks , new ways of insulating and heating houses etc etc.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9872

**Person ID** 1267757

<b>Full Name</b>	SIMON SMITH
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I live in Berkhamsted with my wife and two school age children. My principle objections to the Dacorum Local Plan are based on the negative impact these proposals will have on schools, amenities and transport in the town.</p> <p>The 'plan', such as it is, proposes well over 1,000 new homes in Berkhamsted, an expansion which will presumably lead to a significant increase in working age people living in the town. However the local economy cannot currently provide sufficient employment for these additional working age adults, nor does the plan suggest how the local economy would be expanded. As a result, I would expect a surge in the numbers of people commuting from Berkhamsted railway station, putting additional pressure on an already extremely over subscribed service. Those who do not commute via train, will presumably commute to jobs outside of the borough by car, resulting in significant strain on local roads (not to mention the woefully inadequate bus network).</p> <p>The sites at Bk02: British Film Institute; Bk03: Haslam Playing Fields; Bk04 Land between Hanburys and A41; Bk05 Blegberry Gardens will together comprise 390 new homes. Access to the town (and railway station) from these sites is proposed via Kingshill Way, Cross Oak Road and Shootersway, with enhanced pedestrian and cycle links with the town centre and train station. Kingshill and Shootershill are already incredibly busy at peak times and lie along a walking route used by pupils at Ashlyns school. Cross Oak is single lane traffic for large sections with no pedestrian footpath. School children have to walk in the road for a hundred metres. How is it possible to increase the traffic flow along this road without a significant impact on road safety? It is physically impossible to widen the road given the proximity of housing along the route.</p> <p>In addition to traffic from the 390 homes mentioned above, the roundabout linking Kingshill Way and Chesham Road would need to cater for traffic from the 850 proposed homes from site Bk01. Clearly this would result in substantial congestion and road safety issues for local school children.</p>

In addition, I fail to see how 'enhanced pedestrian and cycle links' can be constructed? Where could these routes possibly be constructed without narrowing the roads? Clearly this has not been thought through and has been put into the plan as a vague afterthought.

The commutative effect will be to send the hundreds of vehicles along routes used by school children attending Ashlyns school with consequences for congestion, air pollution and road safety.

Traffic from the proposed 40 dwellings at Site Bk11 and the further 30 dwelling at Bk13 Billet Lane would have to pass through the already congested junction with the High Street or turn left and pass up Billet Lane and along Bridgewater Road, directly along the school route for Bridgewater School. This clearly presents another significant increase in traffic, pollution and road safety issues.

The hundreds of extra commuters using Berkhamsted railway station will put huge additional strain on an already overcrowded service. Trains are currently frequently overcrowded to the point where commuters often cannot board trains during rush hour. Given that most of the proposed new housing is on the edge of the town, will there be a commitment to increase parking at the station? Those living in new developments in Northchurch will have no option but to drive to the station. I cannot understand how the car park could accommodate such an increase in demand. The physical infrastructure at Berkhamsted station could not cope with the consequential rise in the number of commuters. The additional housing developments at Tring will place further strain on the public transport system, notably a rise in commuters using the services which pass through Berkhamsted station. This huge growth in numbers will make commuting from Berkhamsted completely unsustainable.

Although there are proposals for one additional primary school, there is no commitment to increase secondary school provision in the town. The proposal states that land will be provided for a secondary school, but there is absolutely no commitment or guarantee that one will be built. If no new secondary is constructed, the catchment area for Ashlyns would presumably shrink drastically, with the result that many families currently living to the north, east and west of the town would be forced to travel further afield to schools in Tring and Hemel. This in itself would put a further additional burden on local roads and transport infrastructure. The only alternative would be an expansion of Ashlyns, but given that it already caters for 1,400 pupils is such an expansion realistic?

The proposals lack any credibility. The access and transport proposals are woefully lacking in detail. Anyone with even the vaguest familiarity with the south side of Berkhamsted knows that the routes along Shooters Hill, Chesham Road, Cross Oak Road, and the residential streets in between, are extremely busy during peak hours. The proposals as outlined in the Berkhamsted plan will exacerbate these problems.

There appears to be no cohesion to the proposed developments, nor any appreciation of the impact and pressures they would have on the town.

In conclusion, the proposals would result in a huge strain on local roads, rail infrastructure, schools and local amenities. It is clear to me the proposals have not been thoroughly assessed for their impact on the town and should be rejected.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9883

**Person ID** 1267759

**Full Name** PETER AND TRACY DUDLEY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum**

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 superseded 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** Sustainable Development in Dacorum

**ID** EGS9896

**Person ID** 1267764

**Full Name** JULIE RENNISON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** I oppose any new buildings, there are too many homes, cars, traffic already. There are not enough school places nor parking for local shops  
Please do not build anymore new houses and take away our green space  
You are aware of the concept of Climate change? The impact we are having on our own planet? The more we remove our green space to allow nature to be at home, the more we are putting ourselves at risk. We need to stop the greed and stop the build.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9907

**Person ID** 1267772

<b>Full Name</b>	JULIE COURT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>My Parents moved to HH from London in the 50s.</p> <p>They were part of the 'New Town' idea - satellite towns around London to accommodate families from London and possibly it's slums.</p> <p>They loved their new life in the 'country' along with my brother and sister both under 10 years old. They knew that no matter what, as this town was surrounded by 'green belt' it would always stay a small town in the countryside- what better way to provide a good life for your children and future generations?</p> <p>They had a shiny new hospital built, shops, schools, parks, doctors surgeries... it was idyllic for them.</p> <p>My sister has since told me how the original Hemelites hated the newcomers and what they did to their small town... ripping down buildings and 'developing' areas.... I do not blame them and can empathise with them completely.</p> <p>One only has to look on Facebook to read how people now mourn the loss of such beautiful buildings and places... and cannot understand why places like Berkhamsted, Tring and St Albans have retained their charm and character managing to remain pretty, yet functional places to live.. they love the community we have but are sad for the loss of the beautiful town we could have been...</p> <p>Hemel is now soulless. I was born in 1964, and I grew up in Hemel Hempstead- I loved my town yet as the years have passed I am more and more disillusioned with the planner's poor decisions- I do not understand what you are trying to do to our town?</p> <p>History is repeating itself but now, it's not the beautiful old buildings being ripped apart it's our beautiful green belt- our surrounding countryside, our green space that my parents were told would ALWAYS be protected. Their legacy is being</p>

trampled on, they came here for a new life for themselves and their children yet, now I am saddened to find I don't want this awful town for my children and grandchildren, or indeed myself... as soon as we are able we are leaving Hemel because the town planners do not listen or are not interested in what the people of Hemel Hempstead want.

We need schools, a hospital, pretty little shops, department stores, proper police station.... the list is endless yet DBC charged extortionate rent/rates and plan more housing in a town with absolutely no infrastructure to support it. Yes I am aware that HCC and other government bodies are responsible for done of these things but building more housing will only add pressure onto the already crumbling infrastructure... and Dacorum BC, it's councillors, it's MPs should all be focused on fighting on behalf of their townfolk to retain the green belt, stop new buildings planning and improve/reinstate the facilities we do desperately need.

I do not understand why or how anyone would feel it is in anyone's interests to build more housing on our greenbelt land when it cannot support properly those already living in the town.

Please reconsider this terrible plan, the town is dying and you are killing it off.

I do not support the plans and object to the programme 100%.

Let's try to make Hemel Hempstead a nice place to live - together. Please do not destroy my parents legacy.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS9914

**Person ID** 1267774

**Full Name** AATMA SEESURRUN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9947
<b>Person ID</b>	1267787
<b>Full Name</b>	JOHN AND SYLVIA BANKS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Sustainable Development in Dacorum</b>	<p><b>We strongly disagree with the plan for the type and number of additional houses in Berkhamsted and Tring. Although we accept the need for the provision of new properties, the plan is misconceived as a significant amount of green belt will be lost plus the fact that it will put a considerable strain on the current and future planned infrastructure. Getting a doctor’s appointment is almost impossible and the number of pupils in our school classes are too high. The teachers cannot cope with more children.</b></p> <p><b>It appears that the volume of houses proposed in the Berkhamsted and Tring area is disproportionate to the number of new homes in the whole of Dacorum.</b></p> <p><b>This proposal needs revisiting in order to get the support of the local community.</b></p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9952
<b>Person ID</b>	1267788

<b>Full Name</b>	SARAH LANGER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I wish to register my objection to the housing plans for Tring. There are many reasons, including the fact that, like the mess you have made of Berkhamsted, a town in which I was born and lived for nearly 30 years, the infrastructure will not cope.</p> <p>Equally I like the majority of my generation do not live in Tring to be overrun by new build estates. You will destroy what makes Tring what it is and should remain - a market town.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9957
<b>Person ID</b>	1267789
<b>Full Name</b>	RICHARD WILNE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I write to object to the proposed Dacorum local plan.</p> <p>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.</p>

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.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9963
<b>Person ID</b>	1267791
<b>Full Name</b>	RACHEL DAVIS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>I'm writing to you in response to the local plan consultation. I have tried to respond through your portal but to no avail.</p> <p>As a resident of Apsley, I have looked at the Hemel Hempstead proposal in the most detail but my general thoughts apply to all of your local plans.</p> <p>Quite simply, I don't think it's appropriate for ANY development to be happening on greenfield sites such as those proposed near the Redborun link road and Leighton Buzzard roads are; nor a crematorium at Bunker's Park - what an absurd proposal! I fully believe that NOTHING should happen on any Boxmoor land or adjacent to. We should be enhancing and celebrating our green spaces, and the history of our area. Hemel has a bad reputation but only because its history has been squashed by poorly thought out housing and land use. There's actually a lot to celebrate and learn about the history of this area - I am sure most people do not know anything because it is not celebrated or even recognised.</p> <p>This leads me onto the brownfield sites that have been proposed. For me, it is only acceptable to develop on these if they will:</p> <ul style="list-style-type: none"> <li>• enhance the local area aesthetically.</li> <li>• use sustainable materials</li> <li>• greenery and wildlife will be incorporated into the building and surrounding land design</li> <li>• ENOUGH PARKING IS PROVIDED</li> </ul> <p>I spend a lot of time walking around Hemel and looking at land use and I can see that development on some of these brownfield sites could be beneficial to the town if they are managed correctly.</p> <p>I have also heard (on the grapevine) that Dacorum doesn't actually need as many houses as have been proposed but haven't reviewed this. In addition, I notice there is housing for those who have money and those who do not have any. What about the people that have some, but not lots and perhaps are renting or borrowing from the bank of mum and dad? There is NEVER housing for this demographic.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS9994
<b>Person ID</b>	1267854

<b>Full Name</b>	MARTINA HALLEGGER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Regarding Sustainable Development in Dacorum: nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning. The patent falsehoods involved in these claims is shocking, and frankly insulting.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10006
<b>Person ID</b>	1267858
<b>Full Name</b>	KATE & PHIL BAILEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development There is a gaping chasm between the principle of sustainability and the proposed destruction of greenbelt land. There is no evidence provided of the justification and special circumstances that are required by NPPF (and central Govt) before Green Belt land can be released for development. Contrary to the requirements of the NPPF these proposals prioritise Green Belt land over brownfield sites.
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10014
<b>Person ID</b>	1267862
<b>Full Name</b>	ALEX CHAPLIN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>—The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.</p> <p>— This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.</p> <p>— Northchurch has not been recognised at all. It has been called West Berkhamsted instead.</p> <p>— The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.</p> <p>— There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10045
<b>Person ID</b>	1155402
<b>Full Name</b>	Christopher Stafford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10096
<b>Person ID</b>	1268038
<b>Full Name</b>	LIZ JAZAYERI
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I am emailing to register my objection to the plans as proposed in your over complicated documents, > To even consider a plan for the next 18 years that looks to build 1000 new homes a year is ridiculous. There is not the infrastructure in place to cope with this level of development and parts of Dacorum are already suffering with over development (Apsley is a prime example). > So you do not have my vote with this absurd development suggestion.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10220
<b>Person ID</b>	1268167

<b>Full Name</b>	CHRIS YOUDELL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10262
<b>Person ID</b>	1268213
<b>Full Name</b>	ANDREW DOLWIN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	not thought out, overdevelopment, increase traffic where it's too busy already. Increased noise poloution. Unwanted..

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10276
<b>Person ID</b>	399324
<b>Full Name</b>	Ms Julie Hollway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	There are huge questions over whether DBC is fulfilling its obligation under the National Planning Policy Framework (NPPF) to protect the Green Belt, the boundaries of which "should only be altered where exceptional circumstances are fully evidenced and justified" (NPPF, paragraph 136.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10390
<b>Person ID</b>	1268432
<b>Full Name</b>	SARAH STUBBS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10449
<b>Person ID</b>	1268450
<b>Full Name</b>	JOSEPH STOPPS
<b>Organisation Details</b>	DACORUM GREEN PARTY
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The Local Plan must have firm commitments to build Net Zero Homes. We are calling for all new buildings to 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.</p> <p>The current wording of the plan is aspirational but fails to commit to firm quantifiable performance measures.</p> <p>Trees and woodland are very valuable to the environment and the community’s physical and mental health. We 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.</p>

An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors. The Local Plan should commit to every new building incorporating wildlife into the properties design. Simple and very cheap commitments could easily be incorporated into every building design which would greatly benefit local wildlife.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS10620

**Person ID** 1268732

**Full Name** KATRINA BECKWITH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Further to the aforementioned government response of December 2020,

neither the housing need figure of 16,596 homes nor the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms.

Further to this, there has been no evidenced position provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken so as to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement

In the Grove Fields Residents Association – Consultation Response January 2021 for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

Policy SP2 also seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions, changes to the Use Class Order in 2020 and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units irrespective of the aspirations of Dacorum's plan. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

The GFRA considered with their 2017 consultation submission, that a housing needs delivery strategy, wherein Hemel Hempstead provides the vast majority of supply and the remaining requirement was equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, the GFRA note that there has

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10658
<b>Person ID</b>	1268741
<b>Full Name</b>	BRIAN WHITEHEAD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	The extension of Tring by 2,700 plus houses is outrageous and will significantly alter the nature of the town. Expansion of retail and business in the town centre area will threaten its status as an historic old market town and tourist attraction.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10665
<b>Person ID</b>	1161079
<b>Full Name</b>	Melanie Llewellyn

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I do not believe any of this Plan is sustainable. Nothing in the Plan gives me any encouragement that much serious thought has been given to:</p> <p>1. Water and sewerage which are already inadequate for the area. See CPRE's analysis. Where is there any mention of the work needed, the money required and the location of the necessary services? Here in Potten End we already have cessation of water supplies every summer and very poor water pressure the rest of the time. Its inadequate to keep our freezer functioning normally.</p> <p>2. There is talk in the Plan of improved transport but again no real proposals of routes, the type of transport or the money required. As the proposed development in Berkhamsted and Tring is way on the outskirts there is NO chance that people will walk or cycle on the narrow or steep roads in these 2 towns. To make matters worse the proposed Mass Rapid Transport system in Hemel suggests that traffic coming to and from Tring and Berkhamsted would be diverted from the A414 in Hemel. The most direct route for this traffic goes through Potten End to the centre of Berkhamsted. There is no plan for a new link road from the A41 to the Dagnall Road and the traffic problem would be exported to Potten End village and the centre of Berkhamsted. This is anything but sustainable.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10685
<b>Person ID</b>	1268744
<b>Full Name</b>	DAVID FULLER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"> <li>• Economic role - Very little infrastructure provision</li> <li>• Social role - local services would not be easily accessible by walking or cycling resulting in increased traffic and air pollution</li> <li>• Environmental role - no protection of environment or biodiversity. Increase in water usage not accounted for, potential waste water problems, damage to chalk streams and overuse of aquifers which are already at limit</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10730
<b>Person ID</b>	1145586
<b>Full Name</b>	Miss Hannah Moynehan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p><b>Sustainable Development in Dacorum</b></p> <p>There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10807
<b>Person ID</b>	1268768
<b>Full Name</b>	Amanda Stafford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning  (5)
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10828
<b>Person ID</b>	1268791
<b>Full Name</b>	ELIZABETH FULLER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"> <li>• Economic role - Very little infrastructure provision</li> <li>• Social role - local services would not be easily accessible by walking or cycling resulting in increased traffic and air pollution</li> <li>• Environmental role - no protection of environment or biodiversity. Increase in water usage not accounted for, potential waste water problems, damage to chalk streams and overuse of aquifers which are already at limit</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10839
<b>Person ID</b>	1145633
<b>Full Name</b>	Mrs Suzanne Nixon

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>What is proposed does not stand up under scrutiny with regard to sustainability. The promises made sound impressive, but what will happen in reality.</p> <p>I believe development on this scale in the greenfield locations proposed is in itself unsustainable.</p> <p>Climate change is a reality. The UK has an ambitious and admirable target to reduce carbon emissions. Once again the issue of the scale of development arises here. The very fact of building on this scale will create high levels of carbon emissions. The loss of green spaces and increased volume of traffic will have a negative impact on air quality. There will be loss of habitat for wildlife.</p> <p>I agree with your statement that, "Development can help to mitigate and adapt to the impacts of climate change, through sustainable design and construction and reducing the need for travel, particularly by car." However, many of the sites proposed are remote from town centres and would result in increased traffic in already congested towns.</p> <p>It would be important to ensure that any developers paid more than lip service to delivering truly sustainable design and construction. Often this does not happen in reality.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10869
<b>Person ID</b>	1268798
<b>Full Name</b>	BARBARA PAGE
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	The aggressive growth targets outlined in this plan seem to bear no resemblance to any sustainability agenda. I see nothing in this proposal that could remotely be described as “fully evidenced and justified” as required by the NPPF. On this basis the Plan fails the sustainability test
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10933
<b>Person ID</b>	1268871
<b>Full Name</b>	Ms Karla Hatrick
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>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.</p> <p>May I therefore submit some comments in this email?</p> <p>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.</p>

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** Sustainable Development in Dacorum

**ID** EGS10940

**Person ID** 1268880

**Full Name** Ms Jo-anne Tunmer

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Sustainable Development in Dacorum** There is little in the way of reassurance in the planning process about sustaining villages and the historic character of Northchurch. Rather Northchurch has been labelled West Berkhamsted and simply writes Northchurch out of existence showing absolutely no respect for its historical significance, limited infrastructure or ecology.

What reassurances can be given to protect the individual identity of communities such as Northchurch and Dudswell and that they won't be wrapped up in an enormous and homogenous development stretching along the length of the A41.

**Included files**

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS10951
<b>Person ID</b>	1268886
<b>Full Name</b>	Mr Paul Jayson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11027
<b>Person ID</b>	1268910
<b>Full Name</b>	SIMON LAWSON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I also question whether the proposed development is sustainable
<b>Included files</b>	

<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11081
<b>Person ID</b>	1268918
<b>Full Name</b>	Richard Friend
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>I live on Orchard Avenue [XXX], and have some serious concerns with the proposed local development plan.</p> <p>The Dacorum Local Plan (to 2038) does not sufficiently consider the government’s Ten Point Plan for a Green Industrial Revolution (Nov 2020), or the government’s Cycling and Walking Investment Strategy (April 2017) – and may consequently leave the council vulnerable to legal action.</p> <p>Specifically, the tokenistic references in the Plan regarding contributions to “off-site enhancements to the local road network” do not clearly delineate plans for traffic calming measures and segregated cycle lanes/footpaths, which would reduce air pollution and increase the viability of walking and cycling for short journeys in Berkhamsted.</p> <p>West Berkhamsted currently has an average of 1.48 motor vehicles per household, in 2,401 households. According to the plan, the proposed development in the West Berkhamsted area will create 1,860 households – which will lead to 2,753 additional motor vehicles on Berkhamsted roads, with next-to no commitment to sustainable local travel provision for the thousands of families in the town.</p> <p>Most of the additional motor vehicles will frequently use Shootersway and Kings Road for commuting and town centre access. The junction of these two roads has already seen a deterioration in air quality since the opening of Bearroc Park and the multistorey car park. The air quality at the junction of the high street and Kings Road has also degraded in the same period. Both junctions are a thoroughfare for school children as they make their way to local primary and secondary schools – currently with negligible infrastructure to support them.</p> <p>The current version of the plan does not adequately address four of its own objectives: ‘Mitigating and adapting to climate change’, ‘Conserving and protecting the natural environment’, ‘Promoting and facilitating sustainable transport and connectivity’ and ‘Supporting community health, wellbeing and cohesion’. If these points are not addressed, then the council may endure protracted legal proceedings.</p> <p>As a Berkhamsted resident, a father of two young children, and a strong advocate of sustainable transport for short journeys, I will not stand idly by as my children’s ability to move safely around their hometown is compromised.</p>

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11104
<b>Person ID</b>	1268937
<b>Full Name</b>	Mrs Lynette Hyde
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><b>Q8</b> Is it consistent with NPPF – not qualified to comment</p> <p><b>Q9</b> Any other comment Please do not go ahead with this. Reconsider. This is our borough and deserves better care and planning! This housing policy looks like a land grab to satisfy the greedy developers.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11169
<b>Person ID</b>	1262170
<b>Full Name</b>	Julie Banks

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"> <li>• <b>Sustainable Development</b>, I am concerned to see the number of house we are scoping to build – I understand these figures come from central government but I feel we should build for our local need only and take into account the impact of Brexit and the upcoming census.</li> </ul> <p>I would like to see a sustainable economic policy that offers more than electric charge points, I doubt these are sustainable for generations to come – what will we do with the batteries, what will we do when we exhaust lithium deposits?? When you sat economic development do you mean warehouse space – not many jobs there...</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11363
<b>Person ID</b>	398597
<b>Full Name</b>	Mrs Caroline Freer
<b>Organisation Details</b>	Flamstead Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>1, Proposed housing demand</p> <p>We consider that you have over-estimated the housing demand, 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.</p> <p>2, Impact on Green Belt</p>

S 13, para 133 of the National Planning Policy Framework:

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.

We consider that proposals within the Local Plan directly contradict the National Planning Policy – particularly as 60% of Dacorum is designated Green Belt and the proposed development would therefore be extremely damaging and indeed place a significant question mark over the protection offered by Green Belt status

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS11420

**Person ID** 1269025

**Full Name** JOHN MAWER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** 1 **Sustainable development**  
Currently, the economic seems to prevail over all else. We watch as areas which are labelled as green belt deteriorate because the economic arguments outweigh the social and environmental. Success in this area depends on policies which redress this balance and the ability to apply them.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS11434

**Person ID** 1264362

**Full Name** Juliet Miller

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<b>Sustainable Development in Dacorum</b>  There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11522
<b>Person ID</b>	1269119
<b>Full Name</b>	JENNIFER BLOGG
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11620

<b>Person ID</b>	1158198
<b>Full Name</b>	JACK ARMSTRONG
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	A development like what has been proposed is not sustainable for the local areas infrastructure or ecosystem.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11647
<b>Person ID</b>	1269150
<b>Full Name</b>	Mrs Helena Parr
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The Sustainable Development Strategy should meet the needs of the present without compromising the ability of future generations to meet their own needs. I do not believe the current planned level of development meets either of these needs.</p> <p>Such a large scale building of houses will surely put a severe strain on water supplies to Dacorum. In times of drought there would be no option but to extract additional water from the chalk acquifer which would in turn cause further damage to the Borough precious chalk steams. There are only around 200 chalk streams anywhere in the world and luckily in</p>

the Chilterns we are home to 9 of these rare and precious habitats. Any development in this area must not be allowed to degrade these special places but should in fact protect them for future generations.

<https://www.wwf.org.uk/where-we-work/uk-rivers-and-chalk-streams>

Any proposed development should improve the bio-diversity and protect the natural habitat ,however, the removal of such a large area of green open space in the Berkhamsted plan is very much at odds with this.

Looking closely at the detailed map of Berkhamsted development shows that practically all current green and open spaces will be removed. These are currently used daily by the people of Berkhamsted - young and old, dog walkers, runners - for exercise, fresh air and general good health. Removing these areas does not support a vibrant and healthy population.

Any Sustainable Development Strategy should effectively engage plan makers and communities, local businesses and other interested parties. I am appalled at how the consultation period has been run during a COVID-19 lockdown with no way for concerned parties to meet, discuss and

co-ordinate responses to the Council. I am very concerned that most people in Berkhamsted do not know of the proposed plans because of a lack of information and other issues due to the current pandemic. I sincerely believe the consultation period should be extended so that all interested parties can be informed and have time to respond and comment.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11673
<b>Person ID</b>	1269212
<b>Full Name</b>	PETER SCOTT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<b>Sustainable Development in Dacorum</b>
	There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11719
<b>Person ID</b>	1152494
<b>Full Name</b>	MRS G RUSSELL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Re 5.2 – last but one bullet point: “Minimising and managing . . .” The Plan definitely does not do this. 5.2 – last bullet point: Ensuring that the preferred ...” The form and scale does not allow delivery of the relevant infrastructure.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11763
<b>Person ID</b>	1118045
<b>Full Name</b>	Mr Pdraig Dowd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	I have reservations on other aspects – volume and density, impact on environment, climate and pollution, transport infrastructure and its future, resulting population growth on all services, who ensures that it happens and who pays for it, etc.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11865
<b>Person ID</b>	1269275
<b>Full Name</b>	KALLIOPI KOUTSOU
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11885
<b>Person ID</b>	1269277
<b>Full Name</b>	DEFINE PLANNING AND DESIGN LTD
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	BHL supports Policy SP1 in that it accords with the presumption in favour of sustainable development (NPPF paragraph 11) and its social, economic and environmental objectives (paragraph 8).
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11947
<b>Person ID</b>	1150963
<b>Full Name</b>	SUE TAYLOR
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>The scale of proposed housing across the country (not just our borough) is staggering at a time when we are in a climate emergency and the need to protect our natural environment is at its greatest. If I could I would raise objections to all developments that will negatively impact the environment and local communities. But I only have a voice in this borough, my views are not NIMBYism but a call for a well thought out strategy which will benefit all communities, large and small, a strategy with the minimum possible impact on the environment, so that the Natural Environment can, in the most Nature depleted country in Europe, play its role in securing all our futures.</p> <p><u>Because</u> people are important we need to protect our natural environment, so it can protect us. The Natural Environment is not an optional extra but the one thing that supports us all, from the food we eat to the air we breathe, this has become even more evident as we have struggled with Covid 19 and the Brexit 'teething issues.</p>

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11954
<b>Person ID</b>	1269350
<b>Full Name</b>	Jan Dent Safer Gravel Path Action Group
<b>Organisation Details</b>	SECRETARY Safer Gravel Path Action Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11969
<b>Person ID</b>	1264526
<b>Full Name</b>	Peter King
<b>Organisation Details</b>	Water End & Upper Gade Valley Conservation Society
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Sustainable Development in Dacorum</b>	<b>No Comment other than there has to be a better solution.</b>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS11972
<b>Person ID</b>	1269352
<b>Full Name</b>	Walid Youssef
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12001
<b>Person ID</b>	1161359
<b>Full Name</b>	D B Land and Planning
<b>Organisation Details</b>	D B Land and Planning
<b>Agent ID</b>	1161362
<b>Agent Name</b>	Nathan McLoughlin
<b>Agent Organisation</b>	McLoughlin Planning
<b>Yes / No</b> * Yes	Yes

* No	
<b>Sustainable Development in Dacorum</b>	Key Diagram The provision of the Key Diagram on Page 29 of the Plan is unhelpful. It is not referred to in Policy SP1 and in terms of the annotations it is unclear to those who don't have a detailed understanding of the geography of Dacorum Borough. It is considered that the Proposals Map better serves the objectives of the Plan and as a result, the Key Diagram should be deleted.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12028
<b>Person ID</b>	1207341
<b>Full Name</b>	Mr Adam Wood
<b>Organisation Details</b>	Growth and Infrastructure Manager Hertfordshire Local Enterprise Partnership (and Herts IQ)
<b>Agent ID</b>	1264277
<b>Agent Name</b>	Rob Shipway
<b>Agent Organisation</b>	Lead Consultant Civix
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	These sections provide a strong rationale behind the overall ESG strategy and Herts LEP supports them.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12116
<b>Person ID</b>	1269413
<b>Full Name</b>	Mr Chris Wallis
<b>Organisation Details</b>	Hon. Director of Development Tring Sports Forum

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>4.2 TSF concur with ‘An economic role.’ They do not, however, believe that the proposals in the current format conform to this. It should be noted that sports clubs these days play an economic role in society, the majority employ staff to maintain and run the facilities, and in reverse, it is now accepted by most umbrella sports organisations that having facilities such as bars, etc., enables sustainability of Clubs and should be encouraged.</p> <p><b>Policy SP1 – Sustainable Development in Dacorum</b> No objections 1 <b>Spatial Strategy for Growth</b></p> <p><b>Policy SP2 – Spatial Strategy for Growth</b> No objections</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12195
<b>Person ID</b>	1145481
<b>Full Name</b>	Mr Brian Kazer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>Policy SP1</p> <p>The “environment” element of sustainable development is very weakly addressed. Especially disappointing are the lack of referencing of specific targets from the Herts Sustainability Strategy and HCCSP priorities; ditto re relevant elements</p>

of DBC's own climate emergency action plan; and a clear commitment on standards on building fabric in excess of Building Regs ( especially given Govt progress and road map on improving housing fabric efficiency via its Future Homes Standard); orientation of housing to allow for thermal solar and solar PV installations as part of all new builds, alongside ground and/or air source heat pump electricity generation.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS12226

**Person ID** 1269476

**Full Name** EMILY DAVIES

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS12299

**Person ID** 1269488

**Full Name** SAMANTHA SMITH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>Sustainable Development in Dacorum</b>	The development is not sustainable building on Greenbelt Land and should only be done in “exceptional circumstances”.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12308
<b>Person ID</b>	1269489
<b>Full Name</b>	STEVE HILL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	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.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12380
<b>Person ID</b>	1164091
<b>Full Name</b>	R.J. Hollis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Sustainable Development in Dacorum</b>	<p>Sustainable development should mean that which is sympathetic to the existing towns and will not change their intrinsic character. The plan proposes very large developments in Tring, Berkhamsted and Northchurch which will detrimentally affect the character of these towns and is not needed as explained in my comments on question one.</p> <p>The proposals are also unsustainable as they do not ensure suitable job opportunities in these locations, which will result in the towns becoming increasingly dormitory locations and lose community cohesion.</p> <p>Sustainable now means also compatible with the country's efforts to mitigate climate change. The plan only provides warm words; what we need is concrete actions such as, all new housing should be to Passivhaus standards with heating by heat pumps not gas boilers (as proposed by government). Development should include specific public transport, cycling and walking requirements, if these cannot be included, then the development is not viable.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12425
<b>Person ID</b>	1146040
<b>Full Name</b>	Mrs Rachel Macdonald
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p><b>Sustainable Development in Dacorum</b></p> <p>There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12477
<b>Person ID</b>	1269523

<b>Full Name</b>	RORY LUMSDON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	Please see below answers.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12487
<b>Person ID</b>	1269524
<b>Full Name</b>	DAVID ATKINSON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<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.</p> <p>Dacorum Borough Council declared a climate emergency more than a year ago, 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.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum

<b>ID</b>	EGS12517
<b>Person ID</b>	1207806
<b>Full Name</b>	Mr Chris Graebe
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	"Sustainable development" ? In 1.37 the Council state that they wish to "release land from the Green Belt", which is a truly shocking way of describing their wish to destroy huge acreages of Green Belt. How can this be considered in any way sustainable? Once again, nature will be in retreat.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12543
<b>Person ID</b>	1269544
<b>Full Name</b>	Ms Lindy Foster Weinreb
<b>Organisation Details</b>	Chairman Berkhamstead Citizens Association
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	We consider the Housing Growth numbers in the Plan is based on flawed assumptions, we note the text in Para 5.3 – 5.5 [P30] :

We acknowledge and welcome the statement "... but will not pursue and urban intensification strategy that detracts from the character of these locations." However there have been many householder planning applications where greater densification has eroded former Character Area guidance, hence becoming the new default.

The proposed release of Green Belt around Berkhamsted cannot be described as being '*sustainably located close to passenger transport and other services, facilities and employment opportunities*'.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS12681

**Person ID** 1269591

**Full Name** Ross Campbell

**Organisation Details** Client Director  
Aberdeen Standard Investments

**Agent ID** 1269593

**Agent Name** Jessica  
Wilson

**Agent Organisation**

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

**Sustainable Development in Dacorum** **Policy SP1 – Sustainable Development in Dacorum**  
DBC's presumption in favour of sustainable development is supported and is in accordance with the objectives set out in the NPPF (2019).  
DBC's commitment to working proactively with applicants with the aim of finding solutions which mean that proposals can be approved wherever possible is supported and our Client will seek to proactively engage with DBC accordingly.

**Included files** [Network House - DBC Draft Local Plan - Representations 060120.pdf](#)

**Title** Sustainable Development in Dacorum

**ID** EGS12737

**Person ID** 1145958

**Full Name** Mr Adrian England

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>Climate Emergency and Conserving Nature both mean that the numbers are impossible, without unthinkable costs to our environment. The overall level of growth is clearly unsustainable (there must be a Water supply lock).</p> <p><b>Water supply is a fatal shortcoming for this plan. In my view the Plan (with numbers anywhere above 355 or 363, ie, the affordable homes) fails on this test alone.</b></p> <p>18.16 refers to protection of “sites”, but does not refer to the rivers or the groundwater.</p> <p>18.18 refers to “refusing planning permission” if there are “significant adverse impacts”, specifically mentioning “water quality”, (lack of quantity being extreme lack of quality!)</p> <p>18.23 is out of date; it refers to “a new NPP expected in 2020”.</p> <p>18.39 notes the global rarity of the chalk streams in Dacorum, their relatively poor ecological status and the need to return them to good status. DBC passed a Motion recognizing this in 2019, but it is not acknowledged; it must be.</p> <p>18.40 notes that water resources are under “extreme pressure” from the use of groundwater for water supply and from climate change. The recharge of groundwater is under pressure and this threatens the retention of fragile ecosystems susceptible to the availability and flow of water.</p> <p>18.41 talks about restoring river flows and natural habitats along the chalk streams, retaining water in the catchment and supporting biodiversity.</p> <p>It then leads to Policy DM33. This policy contains six sub-sections, the most crucial one being:</p> <p>C. avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments. The problem is that ESfG details say the right things, but the number of homes defies the statements there. I can see no real tools or an action plan here to ensure that the policies will be achieved because the housing numbers are so large.</p> <p>Referring to the “Interim Sustainability Appraisal Report”</p> <p>B.8.1 provides the key policy context including the current Key Directives, Regulations and Plans in relation to water and water resources.</p> <p>One of the key aims stated is “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 <u>at the latest</u>.</p>

B.8.2 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 “over-abstracted” and the groundwater resources being “at or approaching full utilisation”. It also estimates that climate change will result in a further 5% loss of available water by 2035.

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 says that at the highest level of development periodic water shortages are likely. This is unacceptable.

The section on mitigation of the negative impacts clearly recognises that not all detrimental effects will be avoided if these numbers are contemplated.

Council passed a Chalk streams Motion unanimously in 2019, to protect the Gade and Bulbourne, but a 28% increase in housing which increases population cannot be sound unless the work needed to establish a sustainable water supply is firmly established and assured, such that the groundwater is NOT further depleted.

**The draft plan does not say where the additional water for housing, offices, shops and factories is going to come from. It must do this credibly and therefore the developments planned cannot be planned until Affinity/Thames deliver the alternative supply. If it comes from local groundwater then DBC will be breaking it's own stated policy in the new plan.**

MANAGING INFILL, BUILDING HEIGHTS AND USE OF GREENBELT (Planning rules on permitted development will lead to much greater infill development; this needs to be better quantified as a significant contributor to numbers. Where there are plans to build higher, to assist developers, the focus must be on achieving a net reduction in car use and parking congestion. At the edge of Boxmoor Trust, there must be a limit of six storeys, unless gradient allows creative management of storeys and protected sightlines. Higher heights are tolerable approaching the Plough roundabout.

The delivery strategies include a large amount of greenbelt which I do not agree should be released. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release green belt.

SOCIAL HOUSING FOR THE HOUSING LIST 7000 (We need time to accelerate, but by 2025 we could be re-investing rents to fund the borrowing, following a programme linked to substantially car-free living, as active transport kicks in). This ties in with the above point about the shortage of water availability.

The growth we are committed to, through 80% organic population growth factor and social-rent housing need (a Social housing \*lock\*) must be prioritised, since this phase of growth is the last opportunity to do so, unless there is massive regeneration of existing social housing stock.

The Borough's Greenbelt and AONB is precious and should only be released as a trade-off with Social Rent Housing at a strong ratio of Social Units delivered, to space.

The borough needs to see a commitment from the Planning Inspectorate and the Government to the absolute limits on demand for greenbelt land in Dacorum.

## Climate Change, water availability, housing list vs new arrivals

This Plan does not respond credibly to the 2019 Motions of Full Council on Climate Emergency and Chalk streams.

The following is the text of the MOTION ON CHALK STREAMS (2019) (Delete paragraph 2.i and renumber ii and iii as I and ii)

Dacorum has internationally recognised rare natural chalk streams deserving protection and support, rarity to the point where even the World Wildlife Fund have suggested that they should be given special protection. The existing Dacorum Core Strategy documents acknowledge the importance of this asset in supporting endangered species and it is noted that the quality of these chalk streams is measured according to the amount of water present, balance of the water chemistry and the biodiversity of the water habitats supported by flow. Therefore

### 1 This Council

A. notes with concern the perilous state of the Gade and Bulbourne rivers in respect of vitality and water levels, and

B. expresses concern about the depletion of water resources by groundwater abstraction and the harm being caused to the ecology and biodiversity of the local chalk streams.

### 2. This Council

A. instructs officers to

i. write to the Environment Agency (EA) to express the alarm of this Council as to the current poor environmental health of these important chalk streams and to ask the EA to explain to the Council how they intend to retain, protect and manage the rivers Gade, Ver and Bulbourne in the future, this explanation to also set out the EA's requirements of Affinity Water and Thames Water to adapt the sourcing of water

ii. Consider the increased water resources that will need to be provided by Affinity Water and Thames Water for the anticipated local increase in housing development, and write to the Planning Inspectorate and the Environment Agency, making them aware of the issues and seeking their advice with regard to the future development (see reply below)

### 3. This Council, in furtherance of its objects, will

a. work with all relevant agencies to ensure that the decline in the quality of our chalk streams is halted and reversed, and

b. undertake to ensure that our Local Plan will be sympathetic to these rivers and that this council will do all that is possible to protect these important ecosystems

In February 2020 Cllr Anderson received a reply, which points out that rainfall in the South East of England, in the last three years it has been lower than its average. The letter also reveals 3 points:

- The Environment Agency has, since 1993, overseen sustainable reductions in pumping from the chalk aquifer. But the Environment Agency say that “they know these are not enough”.
- A further reduction is planned for the Ver, in 2024, but there are no plans for a reduction on the Gade and Bulborne, because Affinity “have no spare water” for drinking.

- The EA say, in terms, that: “In order to have further reductions after 2024, new resources will need to be developed. For instance a new reservoir or a transfer of water from the midlands or the River Severn. (but the latter is beset with bio-diversity problems and both strategies face long delays).

So the Environment Agency cannot ask Affinity to reduce pumping of the Dacorum chalk until there is – sometime in the future - a new reservoir (at Abingdon).

But who is telling the Planning Inspector? If Affinity is saying there IS enough water but the Environment Agency now say – in this (above) correspondence – that there ISN'T, (and there won't be, for a long time) to whom is the Planning Inspector listening?”

“If Affinity have “authority” to declare that they “have enough” water, and yet they are saying consumers must use less, how clear is that judgement? It is an undemocratic and conditional commercial opinion. Dacorum must limit development on the basis of a water shortage.

I am saying that just as the Planning Inspector has the power to disapprove our Local Plan, likewise Affinity must be compelled by local or national Government to accept the clear conclusion from all evidence that there IS NOT enough water to maintain the World-rare chalk-streams and simultaneously meet the realistic local consumer demand, which includes the demand which can be expected from planned new housing.

Why is the Gade dry in Gadebridge Park, in late summer, and why is it so much reduced from its documented condition two or three decades ago?

**Question 2 – answer continued: Numbers matter, everything, greenbelt AND height are driven by this. This is a One time opportunity if the numbers are not challenged – all flows from there..**

17.1 We declared a Climate Emergency in July 2019 to respond to these challenges and, through this, 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.

However, adding 28% to our capacity for population will add to Dacorum’s human carbon requirement (beyond the activities of the Council).

There is Carbon requirement, Carbon use and Carbon offset. A Carbon neutral community is not going to happen until 2050, so any increase in the population before then will negate the progress in reducing reliance on CO2, even if the Council Services are Carbon neutral by 2030 (unproven). This is not covered in 17.1 to 17.6.

2.2 A significant part of this number is due to come before net zero carbon is achieved, and each additional home supports population growth which will drive carbon demand that will at minimum require local offsetting)

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12802
<b>Person ID</b>	1144694

<b>Full Name</b>	Mr Barry Fuller
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"> <li>• Economic role - Very little infrastructure provision</li> <li>• Social role - local services would not be easily accessible by walking or cycling resulting in increased traffic and air pollution</li> <li>• Environmental role - no protection of environment or biodiversity. Increase in water usage not accounted for, potential waste water problems, damage to chalk streams and overuse of aquifers which are already at limit</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS12927
<b>Person ID</b>	1269677
<b>Full Name</b>	CAROLINE CLIST
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Sustainable Development in Dacorum</b>	I accept that the pandemic has happened between when most of the work was carried out to prepare this plan and now. We do need to have a re-think about how urban areas are used, for example as 'mini communities' to minimise travel and build local communities. The pandemic appears to have accelerated the trends that were happening regarding home working and home delivery. If we want vibrant town centres that prioritise 'active' transport over car use, then we need to move away from old ideas and think about how the provision of services (healthcare, libraries, exercise etc.) are

provided alongside the town centre meeting places and repair shops to create centres for the community. These are generally within fifteen minutes walking time, which means that larger towns need multiple areas.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS12935

**Person ID** 1269678

**Full Name** GARY TRENT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Sustainable Development in Dacorum** Offsetting is not a reasonable compensation for the loss of Green Belt and established natural habitats.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS13041

**Person ID** 1270013

**Full Name** Mr Daniel Ritchie

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Sustainable Development in Dacorum</b>	<b>Sustainable Development in Dacorum</b>  There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS13207
<b>Person ID</b>	1270128
<b>Full Name</b>	Richard Salway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<b>Sustainable Development in Dacorum</b>  There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise ”the ability of future generations to meet their own needs” since they will be in Climate Chaos.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS13321
<b>Person ID</b>	1270200
<b>Full Name</b>	Mr Richard Harman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"> <li>Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS13360
<b>Person ID</b>	924129
<b>Full Name</b>	Mrs Natalia McIntosh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS13387
<b>Person ID</b>	1153922
<b>Full Name</b>	Roger Hyslop
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS13537
<b>Person ID</b>	1260521
<b>Full Name</b>	Steve Ritchie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS13756
<b>Person ID</b>	1270372
<b>Full Name</b>	Janet Tuppen

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p><b>5. Sustainable development.</b></p> <p>5.1 While the Emerging Strategy for Growth talks about sustainability it refers primarily to economic sustainability. Full sustainability needs to cover the three ‘pillars’ of sustainability – economic, environmental, social. Most housing is proposed to be on green belt therefore not environmentally sustainable, as this will remove valuable carbon sinks and reduce biodiversity. Social sustainability is questionable too – while the commitment to ‘affordable’ housing is good, all green belt housing will be on the outskirts of towns, away from amenities, therefore communities will be totally reliant on cars, which is bad for community integration as well as pollution.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS13886
<b>Person ID</b>	1264756
<b>Full Name</b>	Kathryn Salway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Sustainable Development in Dacorum</b>	<p>Sustainable Development in Dacorum</p> <p>There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we will not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.</p>

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS13988
<b>Person ID</b>	1270412
<b>Full Name</b>	James Mullins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS14044
<b>Person ID</b>	1264962
<b>Full Name</b>	Courtney Culverhouse
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	I would like the recommendations of Dacorum Green Party to be listened to. I have summarised the points below.

Sustainable Development in Dacorum  
 Net zero homes which meet the highest externally certified sustainability standards.  
 A commitment to new mixed woodland and re-wilding (with public access) for each new major development area. This is to compensate removal of green belt.  
 An increase in habitat for wildlife to be incorporated into all green field development areas. Each new building incorporating wildlife into the property design.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS14074

**Person ID** 1270478

**Full Name** HANSEN L & H

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Sustainable Development in Dacorum** The significant growth and location of the proposed new housing will lead to a large increase in cars. I fail to see how the excessive increase in houses mainly built on green belt will in any way protect or enhance the environment.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS14245

**Person ID** 1152075

**Full Name** Rob Wakely

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<b>Sustainable Development in Dacorum</b>  There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS14276
<b>Person ID</b>	1270629
<b>Full Name</b>	Rob Bray
<b>Organisation Details</b>	Head of Sponsorship & Fundraising Tring Rugby Club
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	(4) Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS14345
<b>Person ID</b>	1270640

<b>Full Name</b>	Geoffrey Llewellyn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>I do not believe any of this Plan is sustainable. Nothing in the Plan gives me any encouragement that much serious thought has been given to:</p> <ol style="list-style-type: none"> <li>1 Water and sewerage which are already inadequate for the area. See CPRE's analysis. Where is there any mention of the work needed, the money required and the location of the necessary services?</li> </ol> <p>Here in Potten End we already have cessation of water supplies every summer and very poor water pressure the rest of the time. Its inadequate to keep our freezer functioning normally.</p> <ol style="list-style-type: none"> <li>1 There is talk in the Plan of improved transport but again no real proposals of routes, the type of transport or the money required. As the proposed development in Berkhamsted and Tring is way on the outskirts there is NO chance that people will walk or cycle on the narrow or steep roads in these 2 towns.</li> </ol> <p>To make matters worse the proposed Mass Rapid Transport system in Hemel suggests that traffic coming to and from Tring and Berkhamsted would be diverted from the A414 in Hemel. The most direct route for this traffic goes through Potten End to the centre of Berkhamsted. There is no plan for a new link road from the A41 to the Dagnall Road and the traffic problem would be exported to Potten End village and the centre of Berkhamsted. This is anything but sustainable.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS14351
<b>Person ID</b>	1270641
<b>Full Name</b>	WILLIAM ALLEN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	<p>The Local Plan contains very little about sustaining villages, and does not address ensuring that our villages are self-sustaining communities, rather than car dependent dormitory settlements.</p> <p>The plan does not address the Glover Review which proposes to make the AoNB into the Chilterns National Park. Some sites proposed will actively damage the AoNB. There has not been a full consideration of employment in the borough, particularly in light of recent changes, such as reduced office use, which may well reduce commuting.</p> <p>In terms of sustainability, the plan needs to demonstrate:</p> <ol style="list-style-type: none"> <li>1 how it will meet the loss of embedded carbon released by building on Green Belt land</li> <li>2 how the housing will be carbon passive and/or carbon neutral so that the houses do not contribute more to emissions</li> <li>1 how the new housing will not irreparably deplete water reserves and undermine the ecological and environmental viability of the rare chalk streams that flow through our Borough</li> </ol>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS14414
<b>Person ID</b>	1270662
<b>Full Name</b>	MAX GOODE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Sustainable Development in Dacorum</b>	LCR and NR support the overall approach to sustainable development in line with the NPPF and recognises that the draft allocation at Hemel Hempstead Station Gateway can act as a key driver of sustainable high density development within the Borough.

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS14742
<b>Person ID</b>	1270760
<b>Full Name</b>	LQ Estates
<b>Organisation Details</b>	LQ Estates
<b>Agent ID</b>	1270759
<b>Agent Name</b>	Miss Hanna Mawson
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	4.0 This draft policy generally reflects national policy regarding sustainable development however it would assist to clarify that the presumption in favour of sustainable development would apply. It also defines how sustainable development will be delivered in the local context and refers to other relevant policies. This approach is generally supported.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS14850
<b>Person ID</b>	1270808
<b>Full Name</b>	Westmorland Limited
<b>Organisation Details</b>	Westmorland Ltd
<b>Agent ID</b>	1270759
<b>Agent Name</b>	Miss Hanna Mawson
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

* No	
<b>Sustainable Development in Dacorum</b>	This draft policy generally reflects national policy regarding sustainable development, however, it would assist to clarify that the presumption in favour of sustainable development would apply. It also defines how sustainable development will be delivered in the local context and refers to other relevant policies. This approach is generally supported.
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS14882
<b>Person ID</b>	1144629
<b>Full Name</b>	Mrs SOPHIE LAWRANCE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Policy SP1: While this policy is agreed in principle, it is <u>not</u> agreed that the proposed site allocations are consistent with this
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS15054
<b>Person ID</b>	1270849
<b>Full Name</b>	Ms Jessica Lindfield
<b>Organisation Details</b>	St William Homes LLP
<b>Agent ID</b>	210999
<b>Agent Name</b>	Mr Martin Friend
<b>Agent Organisation</b>	Director

Vincent & Gorbing

Yes / No  
\* Yes  
\* No

**Sustainable Development in Dacorum** **Presumption in favour of sustainable development**  
St William support policy SP1 in general terms although note it is not entirely in accordance with the wording of the current NPPF. St William would like to see the addition specific wording at the beginning of the policy which states “*There will be a presumption in favour of sustainable development.*” *The policy should also be updated to reflect the terminology of the revised NPPF, once the revised version has been published. As highlighted above, the draft places greater emphasis on sustainable patterns of development, aligning infrastructure with growth and maximising the use of brownfield land in addressing the climate change agenda.*

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS15078

**Person ID** 1162751

**Full Name** Watford Borough Council

**Organisation Details** Principal Planning Officer

**Agent ID**

**Agent Name**

**Agent Organisation**

Yes / No  
\* Yes  
\* No

Yes

**Sustainable Development in Dacorum** Watford Borough Council support the approach to achieve sustainable development including the target that Dacorum will become zero carbon by 2030.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS15093

**Person ID** 1270925

<b>Full Name</b>	Mrs Kathryn Salway
<b>Organisation Details</b>	Extinction Rebellion Dacorum
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Sustainable Development in Dacorum</p> <p>There are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target and that we compromise “the ability of future generations to meet their own needs” since they will be in Climate Chaos.</p>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS15125
<b>Person ID</b>	1270940
<b>Full Name</b>	
<b>Organisation Details</b>	CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<p>Section 4 of the Emerging LP has regard to <i>Sustainable Development in Dacorum</i>, the overall strategy for which is contained within <b>Policy SP1: Sustainable Development in Dacorum</b>. BPC would expect that the proposed levels of growth that are proposed for the settlement will be at a level that is wholly sustainable and will not be detrimental to the village in the future.</p> <p>Section 5 of the Emerging LP has regard to the <i>Spatial Strategy for Growth</i> and BPC supports the general focus of the strategy that will see the greatest concentration being focused on the principal settlements within the Borough, that is</p>

Hemel Hempstead, Berkhamsted and Tring, in the first instance, followed by accommodating appropriate levels of sustainable growth in the villages and the rural area. It should, however, be acknowledged that, whilst Bovingdon is one of three named Large Villages within the Borough, it suffers quite considerably in respect of its location, accessibility to public transport and main highways, infrastructure problems and its overall sustainability when compared to the other two settlements.

BPC acknowledges that Bovingdon should receive modest and appropriate levels of new development in order to support a range of development needs, infrastructure and community facilities within the village.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS15281

**Person ID** 1161497

**Full Name** Mr Robert Sellwood

**Organisation Details** The Crown Estate

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Sustainable Development in Dacorum** • **Policy SP1 'Sustainable Development'** is supported since it accords with the advice in the NPPF and NPPG.

**Included files**

**Title** Sustainable Development in Dacorum

**ID** EGS15377

**Person ID** 1248890

**Full Name** Mr Stuart Oldroyd

**Organisation Details** Whiteacre Ltd

**Agent ID** 1270853

**Agent Name** Jon  
Goodall

<b>Agent Organisation</b>	DLP Planning Limited
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Sustainable Development in Dacorum</b>	<p>Whiteacre understands that the principles of sustainable development are central to the planning system. As set out in the NPPF (paragraphs 11-16) all development must accord with the central presumption in favour of sustainable development.</p> <p>The Council’s proposed sustainable development strategy aims to deliver the significant uplift in growth required in a sustainable way across the Borough, seeking out opportunities to regenerate Hemel Hempstead and to continue to act as a catalyst for its transformation. The Council acknowledge that they cannot accommodate all the growth within the urban area, so would need to release some land in the Green Belt.</p> <p>While the large villages of Bovington, Kings Langley and Markyate provide a reasonable level of services and facilities, the Council believe that they are relatively constrained in terms of local infrastructure. Therefore, the strategy proposes only modest levels of growth in these settlements.</p> <p><b>National Policy and Guidance Regarding Exceptional Circumstances for the Amendment of Green Belt Boundaries</b></p> <p>The Council has prepared detailed Topic Papers to inform the Emerging Strategy for Growth, including the ‘Green Belt and Rural Area’ Topic Paper and ‘Development Strategy’ Topic The evidence base provides robust support for selection of Grange Farm as a proposed allocation. These representations do not dispute that conclusions for site selection must be informed by the three tests at paragraph 137 of the NPPF2019. It is also true that Caselaw, including the five prescriptive tests identified by Mr Justice Jay in the case of <i>Calverton Parish Council v Nottingham City Council</i> [2015] EWHC 1078 (Admin) are a useful reference point in determining the potential for exceptional circumstances being demonstrated to support the amendment of Green Belt boundaries.</p> <p>Paragraph 138 of the NPPF2019 also demands a comparative understanding of strategy options when considering weighing the potential case for exceptional circumstances and the amendment of Green Belt boundaries. This entails a broader view, taking into account the Plan’s strategic priorities, looking to promote sustainable patterns of development and consider the consequences of directing growth towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</p> <p>Paragraph 139 of the NPPF2019 also sets out that the definition of Green Belt boundaries should ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development. The NPPF is clear that plan-making should seek net gains across all three strands of sustainable development (NPPF2019 paragraph 32) and recognises that the role of strategic policies extends to matters relating to infrastructure provision and community facilities (NPPF2019 paragraph 20).</p> <p>The proper application of national policy and guidance, supported by the Council’s evidence base, therefore provides even more support for the proposed growth strategy for Bovington, including allocation of the Grange Farm site. In</p>

adopting this wider view, it is helpful to summarise the judgment in *Compton PC, Ockham PC & Cranwell v Guildford BC*, SSHCLG & Ors [2019] EWHC 3242 (Admin) (also referred to in the Council's Green Belt Topic Paper).

This case provides an important update in the understanding of exceptional circumstances as part of plan-making. A key principle of national policy identified through the judgment is that “exceptional circumstances” is a less demanding test than the development control test for permitting inappropriate development in the Green Belt i.e. very special circumstances.

There are a number of important findings in the judgment. These highlight the potentially important contribution of infrastructure provision and the potential for release of land from the Green Belt to sustain housing land supply and provide for ‘headroom’ against identified requirements when determining the case for exceptional circumstances. The key principles are summarised in paragraph 72 of the judgment:

*“General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that “exceptional circumstances” exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need. I accept that it is clearly implicit in the stage 2 process that restraint may mean that the OAN is not met. But that is not the same as saying that the unmet need is irrelevant to the existence of “exceptional circumstances”, or that it cannot weigh heavily or decisively; it is simply not necessarily sufficient of itself. These factors do not exist in a vacuum or by themselves: there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy. The analysis in Calverton PC of how the issue should be approached was described by Jay J as perhaps a counsel of perfection; but it is not exhaustive or a checklist. The points may not all matter in any particular case, and others may be important especially the overall distribution of development, and the scope for other uses to be provided for along with sustainable infrastructure.” (Paragraph 72, our emphasis)*

### **The Overall Case for Exceptional Circumstances in Bovington – Relationship to the Proposed Delivery Strategy and allocation at Grange Farm**

Within this context, the importance of the Emerging Strategy for Growth making appropriate provision for growth at Bovington (as a Large Village) cannot be Selection of the proposed allocation at Grange Farm is entirely in accordance with wider objectives for the delivery of sustainable infrastructure, as part of a sound spatial distribution strategy. Successive delays to plan-making have delayed opportunities to sustain and enhance the provision of services and facilities at Bovington. Indeed, the only housing site allocated in Bovington in the 2012 Core Strategy has not been delivered, nine years later.

Significant concern is therefore expressed at those instances where the policies and proposals in the Plan do not fully reflect the ability to provide for identified requirements for sustainable development. It is also relevant to highlight apparent inconsistencies in the evidence base which introduce potential conflict with reasons to support the overall distribution of development (including scope for growth at Bovington).

Briefly, the Council's Development Strategy Background Paper (see paragraphs 5.26-5.27 and 6.28-6.30) reflects a constrained capacity for growth at Large Villages with scope to deliver only modest infrastructure improvements. The Green Belt and Rural Areas Topic Paper (paragraphs 8.42 and 9.11-9.1) provides a similar summary of barriers to identifying opportunities for the expansion or redevelopment of infrastructure provision.

This fails to reflect that the chosen strategy for Bovingdon, including selection of the proposed allocation at Grange Farm, is positively prepared, justified, and far from introducing potential adverse impacts upon development, the Grange Farm site is demonstrably required to support the Council's proposed housing and infrastructure delivery strategy for Bovingdon. The evidence base does not adequately reflect the specific opportunity identified to safeguard land for provision of a new 3 Form Entry Primary School at Grange Farm at a location that would result in no detriment to the character of the settlement and thereby 'future-proof' any additional requirement for growth. This is prior to additionally considering the significant benefits of alleviating surface water flood risk in the wider village and reducing congestion on the High Street.

There would be adverse consequences for sustainable development in any scenario where the current minimum proposed level of growth in the village was not supported specifically as part of the amendment of Green Belt boundaries at Grange Farm.

Failure to recognise this could ultimately risk undermining the perceived effectiveness and justification of the emerging strategy and therefore the Council's overall case for exceptional. However, any such outcome would be incorrect in our view and would itself be inconsistent with national policy in terms of how sustainable development should be secured. These representations should be interpreted on that basis, in seeking to reinforce and enhance the Council's proposed spatial strategy and in-particular ensure that delivery of the proposed allocation at Grange Farm is fully supported and reflected in sound policy proposals that maximise the potential for planning gains.

- Whiteacre supports the selection of the proposed allocation at Grange Farm and this is entirely in accordance with wider objectives for the delivery of sustainable infrastructure, as part of a sound spatial distribution strategy.
- However, successive past delays to plan-making have delayed opportunities to sustain and enhance the provision of services and facilities at Bovingdon, and have limited the amount of new housing built in Bovingdon for many years.
- Concern is therefore expressed at those instances where the policies and proposals in the Plan do not adequately reflect the opportunities to provide for sustainable Whiteacre also highlights inconsistencies in the evidence base, which introduce potential conflict with reasons to support the overall distribution of development (including scope for growth at Bovingdon).

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS15442
<b>Person ID</b>	1271103
<b>Full Name</b>	GRAHAM RITCHIE

<b>Organisation Details</b>	FAIRFAX STRATEGIC LAND (HEMEL) LTD
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	SEE ATTACHED RESPONSE
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS15469
<b>Person ID</b>	1271103
<b>Full Name</b>	GRAHAM RITCHIE
<b>Organisation Details</b>	FAIRFAX STRATEGIC LAND (HEMEL) LTD
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	SEE ATTACHED RESP
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS15500
<b>Person ID</b>	400475
<b>Full Name</b>	Mr Michael Demidecki
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	Policy SP1 “Sustainable Development in Dacorum” sections 4.2 (page 28) It is said that the sustainable development is about “making economic, environmental and social progress for current and future generations”. However the environmental role has not been considered adequately (see my responses to questions 3-9)
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS15546
<b>Person ID</b>	1271479
<b>Full Name</b>	MS JANE HARRISON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<u>Policy SP1: Sustainable Development in Dacorum</u>  <ul style="list-style-type: none"> <li>Policy SP1 takes a positive approach towards the delivery of Sustainable Development and seeks to apply this in terms of planning applications, in accordance with the Development Paragraph 11 of the NPPF assumes a strong “Presumption in Favour of Sustainable Development” in all planning related matters and places a responsibility on LPAs to positively seek opportunities to meet the development needs of their area. Policy SP SP1 is “<b>consistent</b>” with the NPPF and therefore considered <b>sound</b>.</li> </ul>

<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS15577
<b>Person ID</b>	1271579
<b>Full Name</b>	
<b>Organisation Details</b>	BOYER PLANNING ON BEHALF OF W LAMB LTD
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"> <li>The Plan will need to be updated to reflect the housing target calculated using the current standard method. Without making full provision for the need, the Council will face pressure from non-allocated sites which will result in planning by appeal which would undermine the Sustainable Development objectives set out in the</li> </ul>
<b>Included files</b>	
<b>Title</b>	Sustainable Development in Dacorum
<b>ID</b>	EGS15636
<b>Person ID</b>	1271974
<b>Full Name</b>	EMILY FORD
<b>Organisation Details</b>	SENIOR PLANNER
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Sustainable Development in Dacorum</b>	<ul style="list-style-type: none"><li>• Croudace support Policy SP1 given it reflects the presumption in favour of sustainable development set out in paragraph 11 of the Croudace particularly support and welcome DBC's commitment to 'work proactively with applicants to find solutions so that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area'.</li></ul>
<b>Included files</b>	

# 5 - The Spatial Strategy for Growth responses

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS18
<b>Person ID</b>	1253654
<b>Full Name</b>	Jodie Bell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Policy SP2, 3c: 'Tring will accomodate growth of at least 2,700 homes'- This is confusing to me as the plan that I looked at before estimated at least 5000 homes. In Pitstone there have been 2 large developments, both down the same road comprising of at least 140 houses, only a small number of which are affordable. there are also I believe 226 new homes being built on Icknield Way as well as a few others. there has been no new infrustructure added and so has made doctors surgeries, nurseries and the town in generl a much busier place and therefore harder to navigate. I understand that the proposal endeavours to include such amenities but in my opinion this is just too much growth for our small town. On the plan I saw back in October, it looked as if much of Tring would be built over to accomodate these houses. I think that this is unsustainable (both environmentally and socially) and unnecessary.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS23
<b>Person ID</b>	1253669
<b>Full Name</b>	Amy Harman
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS28
<b>Person ID</b>	1207707
<b>Full Name</b>	Mike Beavington
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	As a resident of Boxmoor I am concerned by the principle as stated in 5.2 about encouraging substantial increases in heights ... in the most accessible locations. Development must be sensitive to the local character.  It is hard to see the need for additional retail floorspace when Hemel Hempstead has numerous empty shops and we hear that Debenhams and Topshop are both likely to close.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS35
<b>Person ID</b>	1253620
<b>Full Name</b>	John Howard
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Where is the potential businesses that will be requiring the “Extra Retail Floor Space” in Hemel Tring and Berkhamstead. The only growth strategy for Tring and Berkhamstead and the local villages. Before the Covid outbreak local and country wide stores were closing down leaving empty shops??? All I see , once again, is to build on green field areas. It appears that all the ringing statements about protecting the environment conflict with these plans. What will be the diverse effect on a larger village populous have on the local community, shops, doctors and schools. AS of yet there has been no mention regarding these oblivious issues.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS87
<b>Person ID</b>	1255447
<b>Full Name</b>	Andrew Sparrow
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I support the strategy as it pertains to Berkhamsted, and in particular the non-pursuit of an urban intensification strategy. The proposed Bulbourne Cross development contemplates an estate of 1,100 homes on a single site, and I would far sooner the needs of the growth strategy are met by several smaller settlements around the town.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS103

<b>Person ID</b>	1254846
<b>Full Name</b>	James Martin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The proposed growth is not sustainable. Tring Berkhamsted and Hemel Hemstead (to a lesser degree) are commuter towns. This plan does not provide the employment opportunities commensurate with the scale of housing provision and you need to demonstrate your plan for how this increased population will be employed and how they will travel. My pre-covid experience is that the rail service to central London is already full and that there will not be the service to deal with the additional population.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS120
<b>Person ID</b>	1256444
<b>Full Name</b>	Caroline Williams
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Site Ref: KL02 Land at Rectory Farm. I am seriously concerned at the volume of housing the South East in general is being asked to accommodate. In particular I am very concerned that we are being asked to comment on Dacorum's local plan without sight of the Three Rivers District plan both of which will impact Kings Langley, and in light of the St Albans plan being withdrawn because it is not

sound! The thought that Dacorum have earmarked 275 homes for Kings Langley without any knowledge of Three Rivers plans, is nothing short of irresponsible. Not least because the majority of the village is Green belt, including Rectory Farm. This land is really the last bit of green land between Kings Langley and Hemel Hempstead, which would contribute to the merging of both locations, which is contrary to Green Belt purpose. This is public open space and if 2020 has taught us nothing else, **outside space and green belt is more valuable than ever to people's health, and well being.** Local parks and open spaces have been rammed with people every time the weather is decent, that shows us we need more open green belt space not less! Given we also have no sight of what Three Rivers Council are planning for its part of Kings Langley, I do not see how consideration can even be given to this site without full facts. You really should co-ordinate and work together not isolation, its ridiculous.

There's no consideration in your plans either for the impact of COVID on our high streets, or office space, of which so much more is going to be available now, our old shopping and working world will never be the same again. People have proved they can work from anywhere, it doesn't even have to be the South East, housing pressure will therefore lessen as people see what they can get for their money elsewhere! Office and retail space has to be considered for conversion to housing, if nothing else it would bring the High Streets back to life. Then there's Brexit, and the sheer volume of European population that has left. We are a smaller population now, than we were 2 years ago, and that may continue.

Then we have to consider the impact on the local roads - already gridlocked and Hempstead Road already excessively busy cannot carry on taking all the extra traffic (not forgetting the excess building and flow down from Apsley towards the A41) the local schools are full - indeed Abbots Langley children who would previously have expected to get into Kings Langley school - circa 1 -2 mile journey are now taking long bus rides to schools in West Watford, rather than attending their nearest school. That makes building and maintaining friendships out of school much more difficult again given the focus on youngster mental health not a positive situation at all. Our local health services and hospital are at breaking point, who is going to take all these extra people on? Then there's the environmental impact, summer water shortages, and flooding - which we are already seeing on Railway Terrace where the new houses should really change their address to Railway Lake given the current flooding problem. Our roads cannot cope with the change in weather patterns and the extra rainfall we now see, and because we are building over everything the water has to go somewhere, but where???

This country is known for its green and pleasant lands not for concrete. What about the wildlife that inhabits the greenbelt, that generally brings so much joy to people??

Kings Langley is a historic settlement incorporating the site of a Royal Palace and is still meant to be a village, 200+ houses is a huge increase in population vs existing (10%), and a housing development of that size and scale will be visible from every vantage point, much like the Manor Estate is today, the new bit of which is an absolute eye sore.

I would also be very concerned about the impact of 200+ houses on road safety on Hempstead Road, which is already an accident blackspot.

Finally I am so disappointed that the council is so prepared to turn over our green belt without so much as a fight. It is your duty to protect it at all costs, it is our equivalent of the rain forest and we have to treasure it, respect it and look after it.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS129
<b>Person ID</b>	1256468
<b>Full Name</b>	Barbara Martin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Question 5, Site ref, Growth Area KL02, Land at Rectory Farm</p> <p>I am contacting you to express my objections to the proposed development on the Green Belt Land which is Rectory Farm in Kings Langley.</p> <p>The purpose of Green Belt has always been to prevent coalescence between settlements. Any development on the Green Belt at Rectory Farm would only serve to further merge the village of Kings Langley with the town of Hemel Hempstead.</p> <p>Additionally building 200 houses on this Green Belt goes against another of its purposes which is to prevent sprawl of large built up areas.</p> <p>Further, building 200 houses here would require traffic access onto the Hempstead Road – this road is already extremely busy at all times and, as traffic heads into or out of the narrow village High Street there are already long delays daily, especially during morning and evening rush hours.</p> <p>Another purpose of Green Belt, which is particularly important to Kings Langley, is that it should be to preserve the setting and special character of historic towns. Kings Langley is a village of historic importance which has the site of a Royal palace, an ancient Priory and a beautiful 12th Century Church (All Saints).</p> <p>The addition of 200 further dwellings into Kings Langley, on top of the 3000 + which have been built since the last Local Plan in 2002, not to mention the numerous infills, will put further pressure on the already overstretched infrastructure. The local schools, doctors and other vital service are already at full capacity. The additional traffic will also contribute to further air, light and noise pollution.</p> <p>If the COVID crisis has taught us anything it has to be that open green spaces, fresh air and recreational areas are vital to the well-being and health of the local community therefore building on it is a violation of its purpose.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS136
<b>Person ID</b>	1142526
<b>Full Name</b>	Mrs Angela Goddard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Hemel Hempstead as a relatively new town, has several brown field sites which could be used for development much more appropriately without threatening the massive ruination of the villages. By definition, villages are small communities with their own identities. Of course, powerful building companies are not concerned with people, nor quality of life, but only as vultures looking for rich financial pickings.</p> <p>Can you get Hertfordshire CC to agree to massive spending on the road system to sustain all these extra houses and traffic?</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS139
<b>Person ID</b>	1256688
<b>Full Name</b>	Michael Sands
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>Site Ref: Growth Area KL02 Land at Rectory Farm</p> <p>I object to the proposed development on the Green Belt Land at Rectory Farm. This land separates Kings Langley from Apsley and is an important check to the sprawl of the already over built up areas along the canal. This land should be used to help protect the kingfishers that live nearby by creating a wildlife corridor along the canal and River Gade.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS170
<b>Person ID</b>	1257604
<b>Full Name</b>	Richard Hillier
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>You talk about working with neighbouring districts - developments would be much better placed in areas around Bovington, Ashley Green etc. Are you sure your plans aren't just based on maximising housing revenues from expensive towns such as Berkhamsted?</p> <p>We cannot handle the growth in Berkhamsted itself. The proposals - through the Bulborne Cross development (I cannot tell if these are part of the development you are proposing or not) would also mean destroying Berkhamsted Football Club and replacing it with housing. How can you seriously damage the town's cultural heritage by making moves such as this?!</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS192
<b>Person ID</b>	1257823
<b>Full Name</b>	Thomas Ritchie

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS203
<b>Person ID</b>	1257827
<b>Full Name</b>	Sheila Ashman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	"Providing growth in the villages that reflects their role and character;" - this bullet is critical for Kings Langley. It's a village that has seen growth already with the work around Kings Langley Station. I applaud the building on brownfield sites - just what we should be doing. The greenfield areas like Wayside Farm, should stay green as it is part of the character of the village and the green areas prevent KL from becoming one large conurbation with Apsley & Hunton Bridge/Watford. Your point 5.6 makes a sound point that growth levels should be modest.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS211
<b>Person ID</b>	1160829

<b>Full Name</b>	Garry Pearson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my objection to the use of green belt land on the outskirts of Kings Langley village at Rectory Farm. Any use of green belt land for housing or industrial development is unnecessary whilst there are brownfield sites and land which can be repurposed to achieve the same goal and minimise the destruction of wildlife habitats.</p> <p>This particular proposed development site would reduce the boundary between Kings Langley and nearby Nash Mills and put extra strain on the main road through the village which is often very busy anyway. A new, additional junction on this road would inevitably increase the likelihood of a congestion and potentially accidents.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS215
<b>Person ID</b>	1258049
<b>Full Name</b>	Rod Jones
<b>Organisation Details</b>	
<b>Agent ID</b>	1258047
<b>Agent Name</b>	Rod Jones
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am against this proposal, as I wish to prevent adjacent towns merging together, to check the sprawl of large built up areas, to assist in protecting the countryside from encroachment and to preserve historic towns.

Additionally, traffic and services (eg GP and trains) are already stretched far too thin as things are, further development will completely overload the system. Just leave the land alone.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS223

**Person ID** 868491

**Full Name** Mr Graham Hoad

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

SP2 Providing the additional new homes for Tring will be a significant challenge.

To meet that aspiration, I support significant new investment into sustainable transport initiatives, education, open space and sports facilities. Doctors and Dental surgeries will also need to keep pace with expansion. I also believe that it is important to promote local employment opportunities. We have had a big loss in local employment sites to housing over the last 50 years.

Retail has also suffered of late and a review of business rate policy to favour and assist small enterprises would be welcomed.

I welcome genuinely affordable homes in Tring. We have had a surfeit of Executive and homes for the over 55's of late on brownfield sites.

I think that the releasing of green belt land needs to be very carefully considered.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS243

**Person ID** 1258731

**Full Name** Tony Broadbent

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I suspect market forces and emerging trends (post-Grenfell and Covid) will drive developments away from 'high rises', and I would disagree with the document: 'proactively encouraging substantial increases in heights'. I think providing adequate amenity space, over and above that dictated by current planning guidelines, is essential for physical and mental wellbeing, now and in the future. 'Social distancing' is likely to be a way of life in future, and high rises or tiny gardens are likely to prove unattractive to those most in need.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS303
<b>Person ID</b>	1258240
<b>Full Name</b>	Adele Giles
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The methodology used in the local planning process is being updated, with details to be confirmed, as the Government's algorithm has changed to prioritise construction in urban areas. DBC should hold back from committing to any large scale development until these changes has been settled.  Providing growth through large scale development on Green Belt is a highly flawed strategy and doesn't fit with the ideology of maintaining the character of the 2 market towns, Tring and Berkhamsted. Berkhamsted is settled in a valley with very linear connections to the A41 and any increase in traffic to the already busy railway station and other amenities, would have a great detrimental impact on the centre of town. Tring is surrounded by Green Belt, the Chiltern AONB and

the Chiltern Beechwood SAC, any further large scale development would have a terrible negative impact on both the character of the town and it's unique natural position. How can this be environmentally sustainable and enhancing bio-diversity?  
 Added to all this growth, an almost covert allowance of 2,400 windfall dwellings is to be squeezed in somewhere!

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS316

**Person ID** 1258759

**Full Name** Joanne James

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

In regards to:

- 1 No net loss of office floorspace from 2025 onwards.
- 2 A net floorspace increase of 116,500 sqm of industrial floorspaceThis should be reconsidered due to the effect of the Coronavirus. Many companies will be considering closing office spaces as their employees have been working from home for over a year and the business has survived. As office spaces are a high cost to a company (rent, electrics, gas, health and saftey, security etc), if the virus has proved these are not, in effect, needed, then why pay for them? Rather than increasing office space, it could be that existing space could be converted into housing.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS320

**Person ID** 1259852

**Full Name** Imogen Wagstaff

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The volume of new housing proposed is too high for each of the sites to accomodate and will overwhelm the infrastructure (current and proposed) for the areas. I am very concerned that this strategy is being driven by economic profit rather at the cost of local community and the natural environment. The transport infrastructure will not sustain this volume of new housing and consideration is not being given to the fact that a significant part of this development is taking place on green belt land which should be protects from development, on the edge of the Chilterns AONB. With climate change and the consequences of this becoming ever more pressing, clearing areas of woodland and wildlife for building will increase the risk of flooding in these areas and heighten the possible impact of climate change.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS334
<b>Person ID</b>	1259868
<b>Full Name</b>	Philippa Baker
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I utterly disagree with the proposals for Tring. It would be impossible to maintain its character and appeal if it were increased insize by this much... it's a 60% growth on a small market town with limited infrastructure. Utter nonsense written by number crunchers with no foresight!
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS351
<b>Person ID</b>	1259924
<b>Full Name</b>	Bassil Aslam
<b>Organisation Details</b>	
<b>Agent ID</b>	1259009
<b>Agent Name</b>	Bassil Aslam
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Policy SP2, in particular e. and f. is Supported, with the village of Flamstead in mind.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS363
<b>Person ID</b>	1260058
<b>Full Name</b>	Redbourn Parish Council
<b>Organisation Details</b>	
<b>Agent ID</b>	1260042
<b>Agent Name</b>	David Mitchell
<b>Agent Organisation</b>	Redbourn Parish Council
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The extensive use of the Greenbelt for development between Redbourn and Hemel Hempstead goes against the purposes of the Greenbelt as described in the NPPF. Specifically, the Hemel Garden Communities project will see urban sprawl into the Greenbelt and the narrowing of the gap between Redbourn and Hemel Hempstead. In addition, the extensive use of the Greenbelt will damage the local environment and ecology adding to the problems of climate change. On these issues, Redbourn Parish Council objects to the draft Dacorum Local Plan.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS404
<b>Person ID</b>	1260241
<b>Full Name</b>	BASSIL ASLAM
<b>Organisation Details</b>	
<b>Agent ID</b>	1259009
<b>Agent Name</b>	Bassil Aslam
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Policy SP2, in particular e. and f. is Supported, with the village of Flamstead in mind.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS420
<b>Person ID</b>	1260386
<b>Full Name</b>	DR Michael Wagner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The Covid crisis may precipitate a significant longer-term change in the way that we work and live. The most likely of these outcomes is that there is a significant increase in home working a reduction in travel and potentially faster changes in our high streets.

It doesn't appear that the likely longer term changes in the way that we live have been taken into account in the Local Plan, and I would strongly advocate that this is done before the plan is finalised. Key areas to consider are:

- A review of the future needs for office space. This should consider whether the new office space identified in the Plan is still likely to be required. It should also consider whether the current level of office space will be required, and what opportunities there are to redevelop or repurpose existing offices for housing or other purposes. This could make a significant contribution to providing housing and reduce the need to develop green field sites. It could also be part of a broader plan to revitalise our town centres (see below).
- Town centres have been struggling over recent years and Covid has further increased pressures. The Plan should address how we are going to ensure that town centres are vibrant spaces which address the needs of the community. This may be in part through redevelopment of commercial/retail into domestic accommodation, meaning more people are living in the centre of town. It may also be through providing flexible office space and work resources to provide people different opportunities to work locally. It may also be through development of other community and leisure resources.

A review of 'Home' Working. Covid has seen a massive rise in the number of people working at home. This changes the requirements for travel, increases reliance on good tele-communications and changes the use of houses. All of these issues need to be considered by the Plan. For instance: Do we need housing to include provision of work spaces? Do we need to provide capacity for flexible office spaces and work resources within new developments and within town centres?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS421

**Person ID** 1260386

**Full Name** DR Michael Wagner

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Housing

The Plan identifies a number of areas for housing development, many of which are green field and relatively low density developments. This will result in destruction of green spaces with direct negative impacts on biodiversity and the creation of urban sprawl with the associated problems of more car usage and a change in the character of places. It is also likely that much of this low density development will not be affordable, as there is a history of developments of this type not meeting targets for affordability.

The developments around Tring are particularly noticeable for being green field, low density, which significantly increase the footprint of the town and are likely to change its character. The development of housing further from the town centre is likely to increase short distance car usage, and infilling between the town and the canal (which currently provides a valuable wildlife corridor) is likely to have significant negative impacts on biodiversity.

I would strongly advocate that before the plan is finalised there is a thorough review of opportunities for other types of development, focusing on what can be done by redeveloping existing building or the development of brown field sites. As noted above –reimagining town centres and reductions in the requirements for office space can provide opportunities for housing in the heart of towns, which is likely to provide higher density more affordable housing, which can help to invigorate town centres. The redevelopment of brown field and town centre sites may be more complex than the large new green field developments favoured by the large property developers, but we should take the time and commitment to build a better, greener future. Green field development should be only pursued as a last resort, and where broader value can be identified for the wider community.

The 2050 net zero target means that the homes we build need to be carbon neutral now. The Plan is incredibly unambitious in terms of carbon, para 17.24 states ‘All new homes carbon neutral from 2034’. This means that we will be allowing houses to be built now that will need significant retrofit in the coming years to meet 2050 targets. Carbon neutrality for new build housing is something that was in Government Policy for 2016 (but was then withdrawn), so it can be achieved. The Local Plan must ensure that all new housing is carbon neutral, with high requirements for insulation, requirements for solar photovoltaics and solar thermal panels on roof spaces, the use of heat pumps, and houses designed to maximise/control solar gain. Houses are a key part of our infrastructure so we should demand new investment is fit for the future.

The Plan should also set high standards for the carbon impacts during construction and for the embedded carbon within construction materials.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS445
<b>Person ID</b>	1260507
<b>Full Name</b>	Michael Burbidge
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Increasing the population of Tring by 50% will undoubtedly have a positive economic impact on the commerce in the centre but I would not describe the increase in traffic down a narrow high street, with narrow pavements, and no plan for additional parking as an enhancement.</p> <p>Some of the development in Tring will be close to the station but the plan states that the rail link is at capacity and little likelihood that HS2 will relieve this. There are no plans for additional parking (car or bike) both of which were at capacity before the pandemic.</p> <p>If the council makes good on its promise for additional recreation space in Tring that will be welcome as there is already a shortage of football and rugby pitches and the hockey club does not play in Tring. There was an opportunity with the development site at Roman Park but that has not been included. Why not if it is a priority? Why should we believe the promises in this plan when current developments fall so far short of the promises?</p> <p>There is mention of additional green space but there is no commitment as to what % of the land taken will be made available. There is for the school sites so it is not unreasonable to expect that it should be included. Another opportunity to back out of these promises.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS466
<b>Person ID</b>	1260616
<b>Full Name</b>	Oliver Burrough
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Spatial Strategy for Growth comment</b>	In the process of building new homes, I think two things are important. One - ensure affordable homes are long-term, and will not be sold off by the council to private investors. Two - house building should work with existing features to maximise value of the new property created. For example, if greenbelt is built on, design of the new layout must provide easy access to green spaces/water/views, as this will increase value, and increase revenue from sales. It is also important for developing a sense of place, not merely another characterless housing estate from Taylor Wimpey etc.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS499
<b>Person ID</b>	1141491
<b>Full Name</b>	Mr John Whiteman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	No reason is given for the assertion that Tring and Berkhamsted should 'play a much greater role in delivering growth'. This is totally contrary to previous conclusions and is not consistent with the finding across planning research that larger scale settlements like Hemel Hempstead are much more viable. It is also inconsistent with the expressed aim to minimise development on the Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS502
<b>Person ID</b>	1260803
<b>Full Name</b>	Rollo Prendergast
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I believe that the Growth Strategy detracts from the character of Berkhamsted. Most of the planned dwelling sites are not sustainably located close to passenger transport and other services, the High Street or the station. They will not enhance the town centre. Of themselves they will not provide significant new investment into the initiatives outlined in 3. b. Being piecemeal in nature, they may supply contributions to CIL, but there will be no obligation on the developers to meet those aims. Please see supporting document: 5. Suboptimal stites
<b>Included files</b>	<a href="#">5. Suboptimal sites.docx</a>
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS511
<b>Person ID</b>	1260809
<b>Full Name</b>	James Mac
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	There are far to many houses being planned, particularaly on green belt areas. The road network can not cope with the number of cars as it is! Have you tried driving through Berkhamstead or getting onto the M25 from the A41 junction? If these plans go ahead you will destroy Tring and Berkhamstead. Tring high street is/has died with huge numbers of empty shops. Many of these areas residents will not want lots of affordable houses being built as well, this is likely to lead to change in community mix which is not a good thing.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS530

<b>Person ID</b>	1266575
<b>Full Name</b>	GERALD LAMBERT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to the amount of green space being planned to be built over in this plan. The green belt needs to be maintained. Quality of life if important. If this goes ahead in any way close to the plan, you will be destroying the area.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS532
<b>Person ID</b>	1266577
<b>Full Name</b>	Nicola Maguire & Mark Bonar
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The Government must review the housing quota for Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Consultation and bring about a halt the Local Plan Consultation, for the following reasons:  * When the Government changed it's policy Dacorum should have changed it's Strategy, instead the housing quotas were bolted onto work already done.

\* The plan has too many of the wrong houses in the wrong places, across acres of farmland and neighbouring the Chiltern Area of Outstanding Natural Beauty, comprising wildlife, nature and the local environment.

\* Too many houses where there are too few local jobs.

\* Infrastructure, already at it's limits (doctor surgeries, schools), will experience an increased burden/strain on local communities and facilities. Areas such as Tring, Northchurch and Berkhamsted will have increased, traffic with inadequate Highways, these areas have limited ability to change highways due to narrow old roads and streets lined with character properties of historical value, not to mention the destruction of quiet country lanes. Increased traffic on road networks with limited capacity will increase congestion, air pollution and comprising road safety.

\* Tring and Northchurch will be completely overwhelmed - Tring (old small market town) with a housing quota which would increase it's population by more than half - 55% and Northchurch a village, which in the plan is being referred to as West Berkhamsted. Tring and Northchurch will be changes beyond recognition at a cost of losing their present and historical identities as small rural communities

The above points raise huge concerns to the future of Dacorum and must be addressed before it is too late!

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS536

**Person ID** 1260255

**Full Name** KTB Commercial

**Organisation Details**

**Agent ID** 1260252

**Agent Name** Peter Biggs

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The new Local Plan sets out a growth strategy of providing a minimum of 16,595 homes between 2020 to 2038. This is an ambitious target to achieve, taking into account the Government's recently published Housing Delivery Targets identified the authority as delivering only 89% of the housing target from 2017 to 2020. There is already a deficit of 202 dwellings within a 3 year period and this does not take into account the current implications of the Covid-19 pandemic.

To seek to address the under-delivery of housing, the new Local Plan designates development within the main towns and villages, some of which are significant schemes, that will take many years to deliver.

Policy SP2 sets out a hierarchy that highlights that within smaller villages there will be more limited housing growth coming forward through either ‘windfall’ applications or Neighbourhood Plan allocations rather than allocations in the new Local Plan. It is worth noting that criteria e. refers “smaller villages” and does not make any further distinction between settlements.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS541

**Person ID** 1253627

**Full Name** Debbi James-Saunders

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I object to the proposed development at Rectory Farm which is on precious Green Belt Land in Kings Langley.

If Covid-19 and lockdown has taught us anything, it’s how important our green spaces are in the village to help with our physical and mental health.

Having read the Green Belt section of the National Planning Framework, I understand that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open, so openness and permanence are key. Building on Rectory Farm does not meet the exceptions required to justify building on our Green Belt. I do not understand what has changed since the last local plan in 2002 and the objections that the Planning Inspector had to developing Rectory Farm at that time. I believe that councils should be concentrating on using brown field’s site and ensuring that the brown fields register is kept up-to-date.

I do support providing good quality affordable housing, but not at the expense of our open spaces. Around 3,500 homes have been accommodated in Kings Langley and the surrounding area since the last Local Plan. I would like to see the Rectory Farm land used for recreation. If this land was identified as a strategic open space, a green wildlife corridor along the canal and River Gade could be created.

I do support providing good quality affordable housing, but not at the expense of our open spaces. The additional 145 homes planned will bring extra traffic onto an already busy main road, bringing further noise and air pollution to the area. With a 40mph speed, it is likely that there will be more accidents as cars try to pull into the fast main road. Before that, the site traffic will bring their own problems to our village.

The additional homes will put extra pressure on the infrastructure of the village, particularly on our school and medical care.

I hope that all of my points will be considered and we can retain our Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS542

**Person ID** 1253627

**Full Name** Debbi James-Saunders

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I object to the proposed development at Rectory Farm which is on precious Green Belt Land in Kings Langley. If Covid-19 and lockdown has taught us anything, it's how important our green spaces are in the village to help with our physical and mental health.

Having read the Green Belt section of the National Planning Framework, I understand that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open, so openness and permanence are key. Building on Rectory Farm does not meet the exceptions required to justify building on our Green Belt. I do not understand what has changed since the last local plan in 2002 and the objections that the Planning Inspector had to developing Rectory Farm at that time. I believe that councils should be concentrating on using brown field's site and ensuring that the brown fields register is kept up-to-date.

I do support providing good quality affordable housing, but not at the expense of our open spaces. Around 3,500 homes have been accommodated in Kings Langley and the surrounding area since the last Local Plan. I would like to see the Rectory Farm land used for recreation. If this land was identified as a strategic open space, a green wildlife corridor along the canal and River Gade could be created.

I do support providing good quality affordable housing, but not at the expense of our open spaces. The additional 145 homes planned will bring extra traffic onto an already busy main road, bringing further noise and air pollution to the area. With a 40mph speed, it is likely that there will be more accidents as cars try to pull into the fast main road. Before that, the site traffic will bring their own problems to our village.

The additional homes will put extra pressure on the infrastructure of the village, particularly on our school and medical care.

I hope that all of my points will be considered and we can retain our Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS549

**Person ID** 1260902

**Full Name** Nicola Vincenti

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

This proposal is extremely concerning in how much green space it proposes to eliminate; a main reason why people have moved to the area and continue to invest in it.

Such drastic builds cannot be responsibility thought through when we are unsure of the affects Brexit and Covid will have on Berkhamsted and the rest of the country and it's economic and social demographic and associated needs at this point.

This level of development is not supported by the employment infrastructure of Berkhamsted. Increased congestion and over development but no extra employment or revenue and decreasing benefits as a commuter town if little to no green space left

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS558

<b>Person ID</b>	1260936
<b>Full Name</b>	Peter Hadden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I do not believe that many of the proposals to build on Green Belt land are justified or provide the exceptional circumstances required for planning consent on Green Belt.</p> <p>I believe that the Dacorum Plan should be based on the most recent ONS figures from 2018 which suggest a housing target for Dacorum of around 500 houses per annum half the figure in the Dacorum Plan and which would significantly reduce the need to build on Green Belt.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS581
<b>Person ID</b>	1261084
<b>Full Name</b>	Gale Singfield
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Growth Area KL02: Land at Rectory Farm</p> <p>I am writing to strongly object to the proposed development on the greenbelt land at Rectory Farm.</p>

Greenbelt land is extremely precious protected by policy to retain areas of largely undeveloped, wild or agricultural land surrounding or neighbouring urban areas. It prevents development of the area and allows wildlife to flourish, return or be established.

There has already been c3,500 dwellings built in Kings Langley and surrounding areas and this proposal will reduce further the already limited area of open land between Hemel Hempstead and Kings Langley. This proposal will essentially merge the two together contrary to the main purpose of greenbelt policy.

Developing on this greenbelt land will bring another huge increase in volumes of traffic as well as a mass increase in the requirement for parking spaces negatively impacting the already overcrowded and inconsiderate parking on Hempstead Road, contributing to the existing high levels of pollution.

We have already experienced the impact of development in Nash Mills and the resulting increase in volumes of traffic, precarious parking along Red Lion [Nash Mills] Lane and increase in regular bottlenecks in Apsley and Kings Langley High Streets.

Whilst Three Rivers continue to build large developments just across the canal from Rectory Farm, this proposal will bring further traffic chaos and grid lock through Apsley and Kings Langley as Hempstead Road acts as a funnel for all surrounding towns and villages wanting to access the M25.

We have all learnt valuable lessons as to how precious open spaces are especially during lockdown due to the Covid pandemic. Therefore instead of developing the land for housing, the greenbelt on Rectory Farm should be used as a green wildlife corridor/nature reserve along the canal and River Gade, preserving this valuable open space.

The importance of open space and greenbelt is central to sustaining the conservation of the environment, protecting wildlife and the shape and character of Kings Langley village.

Building houses on greenbelt will destroy the village of Kings Langley through merging boundaries with Hemel Hempstead into one continuous built up area, cause further havoc and mayhem on our roads, vastly increasing levels of pollution, further eroding our countryside resulting in a major negative impact on not only our wildlife but the health and wellbeing of the community.

I vehemently object to this proposal

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS585

**Person ID** 1260922

**Full Name** colin Lillicrap

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS592
<b>Person ID</b>	1261122
<b>Full Name</b>	Mark Slade
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Both Berkhamstead and Tring will be fundamentally chnaged by this plan - my view is this makes them less attractive to live in and will damage the environment in which we live. I'd prefer this didn't happen - Dacorum will eventually encorage anyone who'd like a decent quality of life and environment to leave. They are also singificantly commuter towns today - something that might not happen as much in the future.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS621
<b>Person ID</b>	1261183
<b>Full Name</b>	Oliver Fairfull
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>Spatial Strategy for Growth comment</b>	<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** Spatial Strategy for Growth

**ID** EGS653

**Person ID** 1258939

**Full Name** Ed Shedd

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Comments on Section 5.8 Spatial Strategy for Growth**

1a - We would question the necessity of planning for a minimum of 16,596 homes. This appears to be a top down target from the Government. Where is the evidence both from past performance and forecasting that this the appropriate number of new homes to build? This is such a core foundation of the Local Plan, and we can see little evidence of how this number has been arrived at?

3a - What is the definition of a "sustainable location?" Isn't the use of green belt land for 5,500 new homes with a net biodiversity gain of 10% only an example of using land in an unsustainable way?

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS701
<b>Person ID</b>	1261101
<b>Full Name</b>	Hannah Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The proposed level of housing growth in Tring is on an excessive scale and the strategy does not address the need to maintain the role and character of Tring as an increasingly rare and valuable example of a <b>small and historic rural</b> market town which is attractive and easily linked to larger existing areas of commerce such as Hemel Hempstead and London. Tring serves as <b>green commuter belt</b> which attracts hikers and visitors to the distinctive beautiful town with the Zoological Museum and much more. It is also increasingly important in these days to provide recreational opportunities for residents in the bigger built up areas near Tring, as well as for Tring residents, for health - <b>physical and mental health</b> - without having to drive or travel further afield.</p> <p>If the proposed population growth in Hemel Hempstead and Berkhamsted is 20%, other smaller towns that are more like Tring are 10% and Dacorum overall, 9%, it does not seem fair that Tring should have an astronomical 55% growth.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS704
<b>Person ID</b>	1261251
<b>Full Name</b>	Lesley Ashden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	The predicted growth is very suspect and the plan makes excessive use of Green Field sites as already set out. There is no guarantee that work will follow the provided housing, Hemel Hemstead has long struggled to attract business despite its proximity to the M1. The existing plan and forecasted numbers appear not to have factored in that much of Dacorum is an AONB and the geography of Berkhamsted and resulting traffic implications for the towns and surrounding villages which will no doubt become even worse rat runs. If traffic is to be directed back onto the recently downgraded Leighton Buzzard roads how will the single traffic weak bridge at Water End cope. How is the plan to deal with this?
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS723
<b>Person ID</b>	1261250
<b>Full Name</b>	Christina Thompson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	There is no explanation why Tring has to grow faster than any other town in Dacorum.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS729
<b>Person ID</b>	211245
<b>Full Name</b>	Ms Jody Conibear
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The spatial strategy for growth to focus on Berkhamsted and Tring (in particular Tring) are totally in contradiction with all environmental and conservation promises in this proposal by building almost entirely on GREEN BELT land and areas of outstanding natural beauty. There is no mention about how this will be in keeping with the area. The vast swathes of land that are designated to Tring in this plan are truly shocking, on the doorstep of the Ridgeway trail, National Trust estate and the Chiltern hills. These areas are known nationally for large numbers migratory and resident birds, rare wildlife, chalk downs and other areas of historical and SSI. As seen by the mess of the new housing estate now being built on the Western side of Tring (Aylesbury Road - part of this consultation but the estate is already being built on Green Belt), with the best will in the world, the double aims of providing more homes and improving standards of living and environmental factors are absolutely at odds, particularly when allowing private companies to win the work. As seen with the current HS2 construction, conservation and environment is at the bottom of the priority list for this strategy and the landscapes, nature and wildlife will be forever lost to future generations.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS783
<b>Person ID</b>	1261297
<b>Full Name</b>	Matthew Buchanan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS787
<b>Person ID</b>	1260046
<b>Full Name</b>	Jude Jackson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I applaud your stance in wanting to provide affordable homes for local people but another feature of the Covid pandemic has been that there has been a significant increase in number of people wishing to move from London (Estate agent told me that 60% of enquiries on houses were from people wanting to move out of London). What this has done has pushed up the prices out of the reach of local people. How will you ensure that trying to build houses for local people will not still be out of reach as Londoners outbid local people.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS798
<b>Person ID</b>	1261327
<b>Full Name</b>	Susan Barnard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	1. At a fundamental level, I consider that the estimated demand for housing should not all be accommodated within the local area. To do so allows the continuation of the imbalance between continuing development in the south east, and

lack of investment elsewhere in the country. The harm to the local environment by cramming bulky high density development into sensitive sites and the creation of peripheral boundary extensions, including taking Green Belt land diminishes the openness and green spaces which are important characteristics of Dacorum District.

I do not believe that the development of residential areas, adjacent to the M1 and Junction 8 can be considered acceptable. There will be significant air and noise pollution from such a heavily and continuously used transport artery, with accelerating and decelerating traffic.

2. It is unfortunate that in Hemel Hempstead, there is no comprehensive urban design vision for the Town Centre.

The Conservation Area is limited to the Old Town Area, and that part of the town is to be hemmed in by high density development on presently open land. Has consideration been given to Conservation Area designation of key elements of the original New Town Centre (now denuded significantly by modern development)? New Town developments were a very significant feature of post WWII re- building in Britain, and its 1950s features merit preservation.

The iconic early New Town architecturally low rise and spatial character of the wider Marlowes area is being overwhelmed by infilling redevelopment sites with high rise, bulky blocks. These deliver an overbearing and overcrowded non-human scale built environment. Existing developments replacing the former Civic Quarter, Pavilion and College sites, the developments at the lower end of the town centre between St Albans Road/Golden Hill, the block going up near B&Q and the Canal/adjacent to the A414 Two Waters Road, are all evidence of how unpleasant the townscape will become.

The Water Gardens are imprisoned between the carparks and lower Leighton Buzzard Road, and road and the less interesting building facades of the facing commercial premises in Waterhouse Street. There there is already little permeability through to the pedestrianised town centre. There should be proposals which incorporate this historically significant and valuable space into a larger landscaped pedestrianised area integral with the Marlowes, rather than as at present, trapped between two roads.

The key town centre urban design principles that have been recognised in this recent year of Covid-19 lockdowns, are the requirement for the re-assessment of town centre land uses, the need for spaciousness and landscaping to allow people to spend leisure time and share activities, in open, unpolluted and greened areas.

Future development proposals should enhance such a vision of openness rather than filling every potential open, underdeveloped or re-usable site with massive, tall, bulky buildings.

Under present proposals, the spatial permeability, little as there is, is to be further eroded by development proposed in the former Bus Station/Market Place and the remainder of what was the Civic Quarter. The infilling with large ugly developments will destroy the character of the area...and with high street uses in flux following Covid 19 economic impacts, there will be little sense of place.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS825
<b>Person ID</b>	1260562

<b>Full Name</b>	DAVID WILDE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The number of houses proposed for Tring amounts to an increase of more than 50% over the existing number. This will be devastating for the town and totally destroy its character.</p> <p>I cannot see how the additional demands on roads, parking, shopping, employment, recreational and cultural facilities will be met without significant and disruptive expansion of the infrastructure.</p> <p>Also, the additional residents will place additional pressure on the AONB. This is not the right area to absorb such a huge population expansion.</p> <p>The percentage increase in population OF OVER 50% IS INSUPPORTABLE and will be more than twice that proposed for Hemel and Berko. I object in the strongest possible terms.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS842
<b>Person ID</b>	1261434
<b>Full Name</b>	Mrs Louise Harper
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I object to the proposed houses for Tring - this is far too many for the area and I cannot see how the increase in population can be sustainable for all the local resources.

Tring is steeped in history and character and this increase in population would totally destroy it. Tring's infrastructure cannot sustain such an increase.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS868

**Person ID** 1143779

**Full Name** Ms Julia Marshall

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I agree that the majority of growth needs to be around the main towns, where it is most sustainable, but I do wonder how the infrastructure and environment will support such a high level of growth.

The loss of so much greenbelt is unfortunate and it could be argued, unnecessary given the changes to working practices brought about by COVID-19.

There is an obvious opportunity to meet DBC development objectives whilst minimising the impact on the local community by finding a way to focus development plans on the Bovingdon airfield site which is large enough to accommodate both employment (film studios) and residential units. This could be accessed directly to the A41 roundabout thereby reducing the need to increase traffic flow on the already congested Hempstead to Chesham road.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS892

**Person ID** 488516

**Full Name** mr hugh siegle

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Policy SP2 is the heart of the draft Plan and is opposed on the following grounds:</p> <p>The proposed number of new homes is excessive given the constraints that exist in the Borough. The number may be driven by a perceived need to accommodate the housing targets included in the Conservative Election manifesto, but no effort has been made to challenge this nor take account of the provisions of the NPPF or various Ministerial statements, including one from the Prime Minister to one of our two local MP's, that the Green Belt will be protected and boundaries should only be changed in "exceptional circumstances".</p> <p>The result of the council's decision is that approximately 850 hectares of Green Belt are to disappear, much of it of essential value to the historic market towns of Berkhamsted and Tring. There is no actual explanation of the exceptional circumstances the Council claim exist other than the necessity to meet their target of 922 dpa.</p> <p>The proposed locations of the growth at Berkhamsted will not manage landscape and Green Belt impacts, quite the reverse, nor given the topography of the town and its network of narrow roads allow for any sustainable transport or related infrastructure initiatives.</p> <p>Berkhamsted has exceeded its Core Strategy dpa by 31% - 47 to 62dpa, whereas Hemel has under delivered which brings up the matter of windfalls and where development should be located. An allowance has been made for 2,408 windfall dwellings over the Plan period, 133dpa. The average windfall dpa for the last 14 years is 306. The Council accept that a windfall of 200dpa is a reasonable expectation. (Why a lower figure of 133dpa is used in the SP2 summary is not explained).</p> <p>At the 14 year average an additional 3104 windfall homes would be built over the life of this new Plan. At the Council's reasonable estimate an additional 1192 homes will be built. Out of the total of 16,596 new homes targetted 5945 will be built on Green Belt, (actually referred to as green field development interestingly). If a realistic account of windfall dpa is made the Green Belt requirement would drop to 4753 @200dpa or 2841@306 dpa.</p> <p>North Hemel has two parcels of Green Belt due for release. HH01 to provide 1500 homes, HH02 to provide 4,000 homes but post 2038. Combined and master planned for development now HH01 and HH02 can accommodate all the Borough's Green Belt requirement in a way which will be sustainable and provide the benefits of real scale development to infrastructure and the Council's aims of regenerating Hemel.</p> <p>Policy SP2 is not sustainable and will fail the test of soundness. The Council needs to rethink what their target numbers are and if development on Green Belt is required look to locate it where it can be best accommodated and provide the most benefit, North Hemel.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1008
<b>Person ID</b>	1261434
<b>Full Name</b>	Mrs Louise Harper
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I object to the proposed houses for Tring - this is far too many for the area and I cannot see how the increase in population can be sustainalbe for all the local resources.</p> <p>Tring is steeped in history and character and this increase in population would totally destroy it. Tring's infrastructure cannot sustain such an increase.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1082
<b>Person ID</b>	1261687
<b>Full Name</b>	Caroline Grout
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>There must be other oppotunites to develop affordable housing for key workers, for example, in unused retail and commercial locations. Shops, stores, and offices are closing with the pandemic. We will have empty buildings everywhere</p>

in the Borough. We certainly will not need new offices and as much retail space in the future. The world has changed and your PLAN needs to change with the times.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1118

**Person ID** 1143022

**Full Name** Mrs Lin Phillips

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

my comments to section 4 apply to this section also.

*[I dispute your assumption that such a scale of housing development could be achieved without ruining the character and quality of life in the market towns of Berkhamsted and Tring. The green spaces around these towns are its lungs and contribute to good air quality as well as to the wellbeing of their residents. To build on such vast areas could not possible not impact upon these towns, adding to pressures on their infrastructure.*

*You envisage a growth in retail space, including in Hemel. But since the massive evacuation of high street shops everywhere, this just doesn't make sense. A post covid review of the empty space, both office and retail, in the town centres would surely highlight opportunities to develop sustainable mixed developments, and for residents of new housing in the centres, fewer car and bus journeys would be required, easing pressures on available transport links and traffic. Any existing pockets of green space in and between towns should be carefully guarded for the future. The future citizens of our Dacorum will not thank you for implementing your plan.]*

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1160

**Person ID** 1261837

**Full Name** Kimberley Bond

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The whole strategy, in fact the whole local plan, seems geared around providing a significant number of additional houses and flats, which is far far too much for the region and compared to the number required nationally on average. This is not acceptable regardless of the strategies you employ to deliver them.</p> <p>"taking this concept much further in Hemel Hempstead by proactively encouraging substantial increases in heights and densities in the most accessible locations" This strategy in particular is incredibly worrying for existing residents who, choosing to live in Hemel for the 'town' aspect risk ending up living in an urban jungle with increasing numbers of properties being squeezed into spaces where the strain on resulting infrastructure is not considered until it is too late.</p> <p>"We know that we cannot accommodate all the growth within the urban area, so despite our approach to increasing densities and heights, we do need to release land in the Green Belt" - this is wholly unacceptable. The number of houses being proposed is far far higher than it should be, and the fact that you are proposing to build those homes on the Green Belt should immediately be a sign that it is too many. This is completely at odds with your 'sustainable' narrative.</p> <p>I absolutely object to building further large housing developments on the Green Belt in order to meet a target for new properties which is far far too high for the requirements of the region.</p> <p>"Additional retail floorspace to meet the main identified needs in Dacorum's towns focused on Hemel Hempstead and Tring town centres and, on a smaller scale, in the larger strategic Growth Areas." Has your strategy taken into account the likely revised shopping and social trends of the public in a post-COVID era, and factored this into the requirements for both retail and office space?</p> <p>"A key feature of the strategy will be the intensification of sites within Hemel Hempstead through increased heights and densities. Key areas for redevelopment include sites across the Town Centre and Two Waters Areas. " The Two Waters Area in particular is very prone to flooding. Removal of existing fields and agriculture space there is only likely to exacerbate this problem. The flooding issues on surrounding roads is not even addressed currently, how does the</p>

Council plan to address this if existing flood plains are utilised for residential or office space? Is the additional damage, repair and maintenance factored into the future council budget?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1189

**Person ID** 1261840

**Full Name** Rachel Heath

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I am concerned that the growth is being planned to comply without regard to the beauty or characteristics of the area. There seems to be a delight on the planners part to extend towns and before long they will all be linked in one giant conurbation. In part this is possibly because the plans are based on government calculations from 2014 which are now outdated. Berkhamsted for instance is also restricted in terms of access routes through a Chilterns Valley and a vastly increased population will struggle to negotiate the infrastructure in a timely fashion on a daily basis. Building on the ridges and building higher will reduce vistas and the concept of space for which Hemel was created to give. Can some moderation be applied to the numbers of new dwellings. As town centres are losing their attraction (especially shopping centres) perhaps some housing should be interwoven bringing back life to a deserted Hemel for instance and making good use of the existing infrastructure.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1202

**Person ID** 1261875

**Full Name** Fiona Silver

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Growth in Berkhamsted and Tring will be achieved by building the vast majority of houses on Green Belt - this will of course detract from the character of the locations. You are proposing a massive and disproportionate increase in their size. There is no evidence that there are any 'exceptional circumstances' to justify this use of Green Belt. Also, why is investment focussed in Hemel Hempstead 'supported by growth in Berkhamsted, Tring and the villages'? Does this imply that money generated by development in these locations will simply fund infrastructure development in Hemel?
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1230
<b>Person ID</b>	1259116
<b>Full Name</b>	Tring in Transition (TinT)
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Policy SP2 'Spatial Strategy for Growth', para 3c (Page 31)</b></p> <ul style="list-style-type: none"> <li>'Tring will accommodate growth of at least 2,700 new homes.' This is simply not sustainable, and likely in breach of the heart of NPPF which is 'sustainable development'. It represents at least a 55% increase in the size of Tring, by far the largest urban growth across Dacorum envisaged by the Plan. It is significantly above the evidence-based proportion for Tring based on population growth through the Plan period as amended by Government 'affordability' formula (evidenced in the September 2020 SW Herts Local Housing document). In addition, the Plan presents no evidence that development will enhance the town centre or strengthen its function as a key market town in the Borough.</li> </ul>

**Policy SP2 'Spatial Strategy for Growth', section 5.7 (Page 31)**

- We are not convinced by this point. The size of a village or town is not necessarily the only factor to be considered in determining how sensitive it is to substantial change. If other locations have poorer access and public transport, and/or a general lack of employment opportunities, supporting services or facilities, then arguably these are exactly the places that should see development and improvements.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1255

**Person ID** 1253932

**Full Name** Gareth Scrivens

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1262

**Person ID** 1261930

**Full Name** Chris Gee

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1269
<b>Person ID</b>	1253872
<b>Full Name</b>	Georgia Huelamo
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>As mentioned previously, the housing numbers for Dacorum are wrong and far in excess of what can be considered 'sustainable'.</p> <p>The spacial strategy for growth has many principles of which should be realised first, before the delivery of housing on this scale over this short period of time.</p> <p>The plan must take into account the fact that there must be significant progress towards the strategy's 'aspirations of 'providing employment opportunities' and 'supporting retail development', prior to any delivery of housing supply.</p> <p>It must be considered that the provisions of b.'No net loss of office floorspace from 2025 onwards' and d.'additional retail floorspace' should be continually reviewed and subject to change, on a yearly basis.</p> <p>The new growth and investment strategy does not seem to mention maximising the height restriction of buildings within larger towns, to boost the numbers of dwellings (with appropriate access to green spaces) so to remove the need for large scale use of greenbelt land.</p> <p>Development in the greenbelt will destroy ancient hedgrows &amp; heritage woodland, result in mass tree felling and a reduce green spaces. It will result in the destruction of heritage agricultural land, which will remove future generational job opportunities.</p>

It is agreeable that smaller villages should have limited housing growth, however there should be some importance placed on smaller villages being protected from 'windfall' applications which may seek to destroy the nature and character of these villages and alter their status into a town.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1275

**Person ID** 1145427

**Full Name** Mr David Glenister

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Paragraph 5.5 states “The Growth Strategy for Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.” This paragraph is in conflict with the proposed sites, in which for Berkhamsted are mainly valley wall and ridge-top sites situated at a distance (3-4km) from the town centre. These, by definition are located at a distance away from “passenger transport and other services, facilities and employment opportunities.” Indeed, despite promoting massive growth, the Draft Local Plan offers no proposals for any growth of employment opportunities in Berkhamsted, thus promoting what realistically will be increased high-carbon travel for work for london Commuters. It has also not considered the vast increase of Home Office Workers (Post Covid19) who need green spaces close to town vicinity for physical exercise. South Berkhamsted provides for this space admirably being close to the town. The 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but while paragraph 5.5 offers some protection for the ‘historic character’ of the town it offers no protection for the town’s setting.

I therefore cannot agree with Policy SP2.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS1323
<b>Person ID</b>	1145350
<b>Full Name</b>	Mr Edward Murray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	2,000 extra homes will push the berkhamsted population to near 30k That is ridiculous. It was 12k in 1990, how can an increase of near 200% be justified. Hemel's town centre is aboyt to beocme derlict with retail disappearing, this hould be used for housing
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1392
<b>Person ID</b>	1258930
<b>Full Name</b>	Nicols Bowmaker
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The plan for the level of development in Tring is unacceptable. Development is needed however the scale is hugely inequal when looking at the plans for Tring compared to other sites.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1409
<b>Person ID</b>	1262065
<b>Full Name</b>	Mr George Goldhagen
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	At what point do we allow more and more of these kinds of developments to go ahead until we stop feeling able to claim the title of AONB? When you've built a five-storey block of flats on the summit of Ivinghoe Beacon? Think about your stewardship responsibilities to the environment - when it's gone, it's gone.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1467
<b>Person ID</b>	1262092
<b>Full Name</b>	Elly Haezwindt
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1476
<b>Person ID</b>	1262139
<b>Full Name</b>	Michael Hancock
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Berkhamsted has seen steady growth for the last 60 years and will be in danger of becoming gridlocked by the weight of traffic and the car parks overwhelmed despite the alleviating effect of the A41. I cannot see a ready solution to this problem.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1491
<b>Person ID</b>	1262216
<b>Full Name</b>	George Godar
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The spatial strategy is based on the erroneous excessive overall target for new housing within Dacorum. As previously commented, the target, once appropriately reduced, can be met through the use of brownfield sites rather than the Green Belt.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1582
<b>Person ID</b>	1262282
<b>Full Name</b>	Lisa Rowe
<b>Organisation Details</b>	
<b>Agent ID</b>	1262276
<b>Agent Name</b>	Giulia Bunting
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Policy SP2 Spatial Strategy for Growth</b></p> <p>The housing requirement of 16,596 homes is based on the Government's previous proposed changes to the Planning Reform White Paper (922 homes pa). However, the Government has now reverted to the previous Standard Methodology which would require the delivery of 1023 homes pa. Therefore, the requirement set out in Policy SP2 does not reflect the government's updated approach.</p> <p>BFI supports the proposed growth at Berkhamsted of at least 2,200 new homes.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1629
<b>Person ID</b>	1262323
<b>Full Name</b>	Emma Hilder
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1654
<b>Person ID</b>	1147853
<b>Full Name</b>	Geraldine Benson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Along with many other people I have a lot of reservations about the above plan. It seems to have been extremely poorly thought out and has taken no account of environmental issues and the fact that greenbelt land is going to be built on. We don't even know how many houses are actually needed. Instead a higher proportion of the houses should be built on brownfield sites.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1670
<b>Person ID</b>	1262336
<b>Full Name</b>	Mrs Sue Rivers-Brown
<b>Organisation Details</b>	Rothschild House Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing on behalf of Rothschild House Group; the main provider of primary care services in the Dacorum Area, with sites in both Tring and Berkhamsted.</p> <p>We wish to OBJECT to the Dacorum Local Plan Emerging Strategy for Growth (2020-2038)</p> <p>Our current patient list is currently just over 40,000 patients.</p> <p>We have noticed the plans to build a further 1,876 new homes in Berkhamsted and a further 2,274 in Tring with no provision for primary care at all. These plans are on top of the current developments and mean potentially another 12,000 residents at the very least needing access to primary care in the local area.</p> <p>Whilst we, and neighbouring practices continue to accept new patient registrations, we know that all three practices are both very busy with zero ground space for surgery expansion</p> <p>We urge reconsideration on the lack of provision for primary care as part of this plan and would welcome discussion on this point.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1672
<b>Person ID</b>	1165136
<b>Full Name</b>	Mr & Mrs J.D Battye
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>SUMMARY OF MAIN POINTS.</p> <p>1. The 2017 consultation has morphed into the present plan without any public consultation or participation, especially with regard to the formulation of the Development Strategy, preferred Option and Green Belt use. In the process more</p>

notice has been paid to the desires of the development industry and neighbouring councils than those of Dacorum's own residents.

2. The timing of the consultation is inappropriate-official policy is still being formulated and the effects of Brexit and Covid-19 are unknown.
3. The South East of England needs growth less than the rest of the country.
4. DBC should be taking more of a lead on behalf of its taxpayers and challenging central government more robustly ,emphasising the particular constraints of the Borough.
5. Research for the plan is considerable and for the most part objective but its transmission into policy is flawed. There is enough detailed material to avoid such a sterile, top-down approach.
6. The artificial formulation into a "Spatial Strategy" is needless, too complex and illogical and the most sustainable options and sites (e.g. Option B and a number of individual sites) have not been consistently selected.
7. Growth is being viewed as a means of improving an infrastructure which is already deficient. Growth will itself generate the need for more infrastructure.
- 8 Proper infrastructure planning should come first and should not be used as a mere means of mitigating the deleterious consequences of development.
9. The cumulative effects of development are still being largely overlooked.
10. Developers make large profits(e.g. Persimmon etc.)and should be required to contribute much more via CIL and Section 106 obligations to the provision of proper and appropriate infrastructure throughout the Borough.
11. Enforcement of planning conditions should be applied more rigorously than in the past.
12. If unavoidable, as the most sustainable site, North Hemel Hempstead should be utilised in its entirety at the outset, allowing it to benefit from proper infrastructure planning and delivery and economies of scale.
13. Bovingdon Airfield should be used as it is previously developed land and would relieve pressure on other Green Belt areas, notably Grade 2 land in Tring and Bovingdon itself and smaller sites in Berkhamsted.
14. Official Green Belt policy is being flouted. "Exceptional circumstances" mean exceptional circumstances. Alternative sites or solutions have not been sufficiently investigated or considered.
15. The particular topography of Berkhamsted is being totally ignored where obvious physical constraints mean sustainable transport proposals are unrealistic and unworkable. The centre of Tring is similarly constrained.
16. The conversion of offices to affordable housing should continue (albeit suitably controlled) in the light of changed working practices. Shortage of space in industrial areas, however, may necessitate a ban on such conversion.
17. Current WHHT plans to concentrate redevelopment on Watford are diametrically opposed to announced sustainability and connectivity policies and should be opposed.
18. DBC itself should adhere to its own policies( e.g. Trees & Woodlands) more strictly than hitherto.

19. Notwithstanding the declaration of a Climate Emergency there is little acknowledgement that any development is negative for the environment, biodiversity and sustainability. Offsetting damage in one area by a contribution to another does not constitute a positive outcome for the initial development. How is a 10% gain in biodiversity to be measured, let alone achieved?

20. The proposed infrastructure interventions, particularly in connection with transport and highways, are in the main cosmetic, minor, a ludicrously expensive waste of public money and fail to solve the major underlying issues.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1678

**Person ID** 1165136

**Full Name** Mr & Mrs J.D Battye

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

As for site selection, some more sustainable sites in Hemel Hempstead (Polehanger, Shendish, Fletcher Way), Bovingdon (Homefield, Duckhall, HH rd.) and Kings Langley (Hill Farm, Wayside) have been rejected while lower scoring sites on Green Belt land in Tring and Berkhamsted (Haslam, Blegberry, BFI, Rossway, Hanburys etc.) are being put forward. The “scoring” in the TFL survey has been ignored in order to make the results fit the desired, pre-conceived, schematic plan thereby undermining the claims at 7.3. Such an approach then impacts directly upon development in the Green Belt. Sufficient analysis has been carried out to produce a more logical result. What has been put forward does not look like the best available outcome. This top-down methodology, similar to that being employed by central government, will completely negate the fine sentiments of the Borough Vision. The guiding principle of sustainability has been clumsily applied, especially with regard to connectivity and in the light of the supposed official requirement to justify exceptional circumstances for Green Belt release, and insufficient attention has been given to particular topographical, physical and demographic constraints.

We therefore question the assertion at 6.2 of the Development Strategy Paper - “Our preferred approach to the overall scale of growth and its broad spatial distribution is logical and justified.”

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1680
<b>Person ID</b>	1165136
<b>Full Name</b>	Mr & Mrs J.D Battye
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>LOCATION OF DEVELOPMENT.</p> <p>As mentioned above much research has been put into the plan and yet the result is an illogical denial of much of that work. The production of the Spatial Strategy ignores many of the appraisal findings and then shoe-horns the eclectic results into a needlessly complex schematic format. The support for option C1 in preference to option B defies the statements that Hemel Hempstead is the most sustainable location for development.(23.21 et al.)The council defends its decision at Int.SA p.43-“the council considers that significant growth is already proposed for Hemel Hempstead. “</p> <p>That justification is arbitrary, unscientific, fails to acknowledge that" Dacorum is uniquely constrained”(1.35) and runs counter to the scoring of the appraisals, especially with regard to climate change (Int.SA Table 5-1 p.29)supposedly the object of a 2019 declaration of emergency.</p> <p>On the matter of individual site selection, the reasons for selecting some sites over others and for rejecting some sites altogether is not transparent or consistent with the appraisals which have been carried out. Nor does the selection pay proper regard to the official requirement for Green Belt to be released only when other options have been exhausted and then only in “exceptional circumstances.” (see in more detail below.)</p> <p>Bovingdon, Kings Langley and to a relative extent Hemel Hempstead appear to have escaped the full brunt of new Government calculations at the expense of Tring and Berkhamsted. The justification for this seems to lie in a particular interpretation of 'sustainable development' and what may well prove to be a questionable attempt to cut emissions. Are Hemel Hempstead and Kings Langley not more sustainable on grounds of connectivity and less constrained by Green Belt and other topological factors than Berkhamsted and Tring?</p> <p>Indeed the Sustainability Appraisal indicates at p.43 “Significant growth is planned for Berkhamsted and Tring. This growth is necessary to consolidate these towns’ respective roles as the most sustainable locations outside of Hemel Hempstead ensuring the necessary infrastructure is in place to support existing and future communities.”</p>

This statement begs at least 4 questions. Why does their role require consolidation? Do not their physical constraints (congestion, Green Belt, topography) argue against their level of “sustainability”? Is the Borough admitting that their existing infrastructure is demonstrably inadequate? Is further growth requiring further infrastructure being imposed there as the solution to present infrastructure inadequacies? (see also above. )

” Developments acknowledge local character “ says 2.2. In fact, the local character of Tring and Berkhamsted will be severely compromised by the plan.SA D 53 admits that the houses proposed on greenfield sites in Berkhamsted “could have” negative impacts for the landscape. How is this consistent with SP11? Studies indicate that 1750 out of a total of 1876 houses in Berkhamsted will be built on Green Belt land and 2250 out of 2274 in Tring. Such overwhelming proportions must surely contravene official policy, as noted below.

The regeneration and transformation of Hemel Hempstead features prominently in the plan’s priorities.(2.1.) The plan stresses repeatedly that Hemel Hempstead is the most sustainable location (SP3.23.21.Int SA p.47 etc.) Kings Langley looks sustainable (23.166) and Bovingdon less so but not as “remote” (Int.SA C12.) from the Hemel railway/transport hub as some parts of HH itself. The logic of withholding part of the North Hemel site which with regard to climate change and employment is the most sustainable of all completely defeats us when set against the topography and settings and other constraints of the proposed developments in Berkhamsted and Tring. The Development Strategy Paper of November 2020 lists the benefits of North Hemel as a large scale development(4.44 p.25). Hemel Hempstead also possesses more open land within the urban area than any of the other settlements.

2.20 stresses how important it is to make “effective use ”of urban land; indeed Government policy requires it.(2.23.)

With regard to water supplies Int.SA B p.45 indicates ”Focusing growth proposals on Hemel Hempstead could provide a greater number of unrestricted opportunities utilising the capacity of the present system and relieving pressure on Berkhamsted.” Indeed the plan declares that it is “likely that (the water situation in Berkhamsted) will require strategic intervention from 2031 onwards to accommodate the scale of growth within the Berkhamsted STW catchment.”

We would certainly agree that Hemel Hempstead requires further regeneration but think that should also be achieved by more town centre, higher-rise residential development to enliven the drab, post-war western parts of the main shopping area. Such an expansion of residential character should enhance the leisure economy and provide many affordable homes , particularly when conventional retail business looks wholly uncertain in the wake of increased internet shopping(v.9.16). If Hemel Hempstead, as the most sustainable location, is to be the main beneficiary of Borough funds, as it has certainly been in the past, the town should bear a commensurate burden in providing new affordable homes. House prices there are already the most affordable in the Borough (Int.SA B TableB-11-2) . The very principle of connectivity on which site allocations are supposedly based also supports this emphasis. Furthermore Hemel Hempstead currently possesses a surplus of school places (SA B 13.2.4 ) and, unlike Tring and Berkhamsted, a significant proportion of the proposed sites lie within the existing urban area.(23.21). Indeed Jarman Park even offers a brownfield site for housing which, contrary to the hierarchy of sites, is being ignored for such a purpose. The plan wrongly intends to retain the vacant land(9.16) on what is hardly an out of town site.

If such a site is not used or development discouraged as per Int SA B p.80 - and current retail patterns argue that it will not be required - the council can hardly argue for any Green Belt release under “exceptional circumstances”.

A full immediate development of all the North Hemel Hempstead site would allow proper and adequate infrastructure to be put in place from the beginning, provide economies of scale and avoid the pitfalls of a series of smaller sites on Green Belt land, as proposed in Berkhamsted, where the infrastructure required cumulatively will not be provided by any one site and therefore will prove inadequate (v.Int SA B D-16). Indeed the deficiencies of Berkhamsted are well articulated; primary and secondary schools (23.102 ), open leisure space (Int SA B 60,63 ), sports facilities (22.44 implies), service provision, water supply (DM 33,35.2.c) and treatment (SA19) (SA B 10.2.5). Moreover the topography of the town militates against the use of more sustainable forms of transport.(v.SA p.22) Tring is similarly handicapped by a shortage of school places and plans there will also require the provision of 2 primary and 1 secondary school.(23.147.)

The plan still insists that growth will be infrastructure-led in Berkhamsted ( 23.102) and Tring (23.139). We would contend the opposite, as mentioned above.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1702

**Person ID** 1262353

**Full Name** L HOUSDEN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** see attached representations - it is TTC's view that the overall strategy of directing so much growth to Tring is flawed. Other strategies have been insufficiently explored before proposing draft policies such as SP2, SP3, SP4, SP6

**Included files** [Tring Town Council - Completed consultation Comments Form \(Final\).pdf](#)

**Title** Spatial Strategy for Growth

**ID** EGS1776

**Person ID** 1154047

**Full Name** Brendon Sparks

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>The Spatial Strategy for Growth sets out that the number of homes to be built and where these are to be located – 64% will be on Green Belt (77% on Greenfield). This includes 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target. This is neither justifiable nor understandable. There are a number of examples where Government states it is not a target. It is a growth strategy at unsustainable locations at the massive cost of swathes of Green Belt.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1803
<b>Person ID</b>	1262358
<b>Full Name</b>	Jennifer Scott
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Paragraph 5.5 states “The Growth Strategy for Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.”

This is absolutely not the case! The proposed sites for Berkhamsted are mainly valley wall and ridge-top sites situated at a distance (3-4km) from the town centre. These, by definition are located at a distance away from “passenger transport and other services, facilities and employment opportunities.”

Despite promoting massive growth, the Draft Local Plan offers no proposals for any growth of employment opportunities in Berkhamsted, thus promoting what realistically will be increased high-carbon travel for work. The 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but while paragraph 5.5 offers some protection for the ‘historic character’ of the town it offers no protection for the town’s setting.

I do not agree with Policy SP2. The headline target of ‘A minimum of 16,596 homes’ is simply wrong. I understand that the figure is based on the Government’s method of calculating housing ‘need’ for an area, which is/was 922dpa (potentially usurped by 1023dpa), but at this point there is no need to argue the rights and wrongs of the algorithm employed by Government (that should have been done within DBC’s evidence base – see section 26), because it is not a strict target set by Government. These numbers CANNOT be used to take land out of Green Belt – they do not represent “exceptional circumstance”.

Government has made it crystal clear that the numbers are a starting point only and it is up to Local Authorities to know if local constraints such as Green Belt means that the numbers cannot be delivered.

Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I fail to understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified”. DBC have seem to mis-understood their responsibilities. Paragraph 136 of the NPPF is clear “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified’, and not the other way round. Paragraph 19.6 of the Plan does say “In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries.’ But, beyond that statement there is absolutely no justification offered, except the Government ‘target’ that isn’t actually a ‘target’. Readers of paragraphs 19.6 and 19.7 in the ‘Managing Development in the Countryside’ section are directed to the Sustainable Development Strategy chapter of the plan for justification, but I am at a loss to see anything in paragraphs 4.1, 4.2, 4.3 or Policy SP1 that could remotely be described as “fully evidenced and justified” as required by the NPPF. Indeed 19.7 also specifically states DBC have “identified those areas on the edge of the main settlements where exceptional circumstances exist”, thus inferring that exceptional circumstance exist for the settlements protected by the specific Green Belt releases. These “exceptional circumstances” are certainly not evidenced.

If the SP2 target is allowed to stand, latest ONS statistics confirm that DBC are planning for a massive oversupply compared to local need at the expense of valuable and irreplaceable Green Belt land, potentially as much as 850 hectares. The 2018-based household projections suggest an annual household need figure of 341 for Dacorum, while The Development Strategy Background Topic Paper identifies 10,954 (609dpa) urban housing supply over the Plan period.

So, using DBCs own figures for identified housing supply, developing in urban areas only will produce a 78.6% uplift in housing supply above the ONS identified need for Dacorum.

There are clearly no exceptional circumstances with regards to housing supply in Dacorum. Indeed, if we look further at the DBC's figures it is noted that DBC have included just 2,408 windfalls (133.8dpa) of the total 10,954 urban homes (22%), but over the last 14 years, the Urban Capacity Study shows windfalls have come on-line at the rate of 306.2dpa (4,287 total). DBC have effectively reduced their windfall expectation by a massive 56%. To put it plainly if windfalls continue at the same rate, urban capacity will produce a total of 14,059 homes or an annual rate of 781.1dpa. BRAG accepts that a cautious approach by DBC on windfalls may be prudent in normal circumstances and that past completions may not be repeated at the same rate, but we are entering a postpandemic time with altered working practices that will surely lead to more change of use developments. Reducing windfall projects to the level that DBC has is impossible to reconcile with the facts and clearly shows that the destruction of 850 hectares of Green Belt is totally unjustified. Statement 2 in SP2 starts

“The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring”. BRAG is concerned about this wording as in its current form it suggests that ‘investment’ will be focused on Hemel Hempstead and that investment will be supported by the growth at Berkhamsted and Tring. Certainly, historically infrastructure investment in Berkhamsted has not matched housing growth, while the majority of funds raised through s106 from developers compensating for the failure to build affordable housing and the Community Infrastructure Levy (CIL) payments have gone into Dacorum's coffers for funding investment elsewhere. With much higher CIL payments in Berkhamsted than elsewhere in Dacorum, it is easy to see the fiscal attraction of promoting development in Berkhamsted, but if that is a driver then it is wrong. Statement 3 in SP2 states “The majority of new growth and investment will be concentrated in sustainable locations” and continues “Berkhamsted will accommodate growth of at least 2,200 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.” However, the vast majority of this growth is to be sited on valley side and ridge-top Green Belt land sited at a distance (3-4km) from the town centre and railway station, with significant gradients (some in excess of any gradient on the Tour de France!) that will only promote high-carbon forms of travel rather than the stated preference of walking and cycling. Indeed paragraph 23.119 accepts that “congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.” And in paragraph 23.120 goes on to concede that “There are few opportunities for new road capacity in the town.”, while offering one of two solutions “The careful location of new development and promoting opportunities for sustainable travel, will in part help tackle a number of parking and traffic issues.” If it was not so destructive the wording “careful location” would be comic. I repeat that these sites are located at a distance (3-4km) on valley side with very steep gradients and ridge tops. They can only be regarded as carefully selected locations if the express aim was to deter walking and cycling. The second solution offered comes in the form of the ‘Berkhamsted and Tring Sustainable Transport Strategy’ (Paragraph 23.122) but again the report has absolutely no ‘Sustainability’ credentials. Rather it simply concedes defeat for Berkhamsted by merely outlining junction enhancements at relatively minor side roads and crossings within the urban area and new/ widened footpaths along

Shootersway. I have already addressed the flawed numbers proposed by DBC as a whole across the Borough, but I specifically object to the target of 'at least 2,200 new homes' for Berkhamsted and Northchurch. The adopted Core Strategy identified growth of 1,180 homes over that plan's 25-year lifespan, which equates to 47.2dpa. In reality, Berkhamsted has contributed to the Dacorum's new housing stock at a rate of 61.9dpa – in other words completions have out-performed the target by 31.2% in Berkhamsted while new housing stock in Hemel Hempstead has fallen behind the town's target by 9.3%. Much of this can be explained by developers' demand to build in Berkhamsted rather than satisfying need, i.e. Berkhamsted growth is becoming developer led rather than planning led and this Draft Local Plan as proposed is facilitating that process. BRAG contests that given its current size and topography, Berkhamsted has reached its limits of capacity. As conceded by DBC, the town centre already suffers from congestion and poor air quality (data for Lower Kings Road shows the level of NO2 in some periods exceed the 40micrograms/cm3 limit). Building more edge of town developments on valley side/ridge-top Green Belt locations at a distance (3-4km) from the town centre and railway station to satisfy flawed housing targets is not sustainable in any sense of the word. These plans will not enhance the quality of life for residents current or future.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1886

**Person ID** 1262518

**Full Name** Rachel Kempster

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment** The growth for Berkhamsted and Northchurch would increase dwellings by 24%, the urban footprint by 31% and the number of daily car movements by 15,400. 77% of this development would be on green belt. This is totally unacceptable and WILL fundamentally change the town, destroying 850 hectares of green belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1894

<b>Person ID</b>	1262291
<b>Full Name</b>	Paula Farnham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>It is unclear from the document how such large development growth in Berkhamsted and Tring 'strengthens' these market towns. The towns are not designed for the sort of growth indicated - single road centres, narrow roads, existing congestion, insufficient schooling. All of these factors mean additional housing only weakens the towns. These are strong communities but are already not coping with the additional traffic, requirements for GPs, schooling and other infrastructure.</p> <p>The number of houses required appears to exceed the ONS forecast numbers. Why is this? I understand the more recent ONS statistics would almost halve the the numbers Dacorum would plan for. this would reduce the impact significantly on communities and Green Belt land. If not already, Dacorum should be challenging the targets for housing development and revisiting a plan when that challenge has been cleared up.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1902
<b>Person ID</b>	1261980
<b>Full Name</b>	Colin Fleming
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>Growth Area KL02: Land at Rectory Farm</p> <p>We object to building on the green belt on the above land</p> <ol style="list-style-type: none"> <li>1. Risk of flooding</li> <li>2. Loss of wildlife</li> <li>3. Loss of flora and fauna</li> <li>4. Insufficient schools</li> <li>5. Insufficient GP facilities</li> <li>6. Increase in traffic</li> <li>7. Increase of air pollution from increased traffic</li> <li>8. Increase in traffic accidents from blind entrance onto main roads</li> <li>9. Traffic gridlock on already busy roads</li> <li>10 Loss of land carefully nurtured for organic produce for the village</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1907
<b>Person ID</b>	1262553
<b>Full Name</b>	Henry Wallis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The Strategy assumes that large areas of Green Belt land east of Hemel Hempstead and in St Albans District will be allocated for residential and employment development as part of the Hemel Garden Communities project. The St Albans Submission Local Plan has recently been withdrawn from Examination as the Inspectors advised that it would not be found 'sound'. The proposed sites north of Hemel Hempstead (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>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1948
<b>Person ID</b>	1262255
<b>Full Name</b>	AJ W
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Paragraph 5.5 relating to maximising urban capacity but not urban intensification is nonsensical. The sites proposed are some 3-4km from the town and are therefore not close to “passenger transport and other services, facilities and employment opportunities.” and this will increase high carbon transport to work, there are no plans for employment opportunities outlined.</p> <p>The minimum required number of houses outlined is fundamentally flawed in its 'calculation' as is the belief that it is okay to use greenbelt land for such growth. The number produced by the algorithm are not a strict target to be reached come hell or high water. These numbers are a starting point and it is up to Local Authorities to know if these numbers cannot be reached due to constraints such as greenbelt. Government response to recent white paper consultations (published December 2020, so post this Growth Plan) with reference to greenbelt and protected landscapes reads: We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”</p> <p>5 The same response goes on to state “We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.”</p> <p>6 And further clarifies “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.”</p> <p>Congestion within Berkhamsted is already unbearable as conceded in paragraph 23.119, the mitigation being that “The careful location of new development and promoting opportunities for sustainable travel, will in part help tackle a number</p>

of parking and traffic issues.”. The sites proposed are not carefully located and will NOT help tackle parking and traffic issues (all locations will inevitably increase car usage within Berkhamsted town centre).

Statement 3 alludes to new investment in sports facilities and yet nowhere is this justified with plans for any. It is very difficult for children within Berkhamsted to get access to the many extra curricula activities that others in other areas take for granted. Swimming lessons, football are just two that have huge long waiting lists due to a lack of provision and nowhere are these addressed.

The plans as outlined will not enhance the quality of life for current residents and will ensure it becomes a less desirable place to live for potential future residents. Please DBC leave a legacy to be proud of, many of this supporting this will be gone in a matter of years, how will future generations remember them?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1957

**Person ID** 1262618

**Full Name** Jasmine Jenkins

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

Yes

**Spatial Strategy for Growth comment**

How will you ensure new and genuinely affordable homes?  
 Growth in Berkhamsted and Tring will certainly detract from the character of these towns when they are so full already in the town centres. Berkhamsteads population will grow from 18500 to about 24000 if this goes ahead which is too much but Tring will be set to grow from 12000 to about 22000 which is almost doubling and is way too much housing. There is only one quite small street in the centre. This is too much growth. There would need to be lots more health centres and schools to accomodate this and the whole town would completely change for ever  
 I do not think we would not a lot of extra retail areas in Dacorum because there is so much shopping online nowadays

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS1962
<b>Person ID</b>	1262601
<b>Full Name</b>	Anne Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Why do the towns of Berkhamsted and Tring need need to play a greater role in delivering growth to complement Hemel Hempstead? This encourages more traffic. The towns are very different too, Berkhamsted's topography, its deep valley and steep sides, already causes significant challenges regarding its growth, traffic and pollution levels.</p> <p>Planning to put 60 houses in Lock Field is an example of a flawed spatial strategy for growth. How do 60 houses fit into a semi rural location like NewRoad in Northchurch? It does not reflect Northchurch's role and character and it is on Green Belt with beautiful views over the Chilterns and a gateway to National Trust forest.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS1965
<b>Person ID</b>	1262604
<b>Full Name</b>	Ray Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	5.2 The problem here is the presumed need to significantly boost the housing supply, because the numbers are wrong. There is no necessity to develop greenfield sites, or redefine land as "urban", which is not actually built up, and requires

extensive infrastructure. However, using derelict land that lies within existing, genuinely built up areas which have access to existing utilities.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS1989

**Person ID** 1205547

**Full Name** Mr B Giddings

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** after reading and seeing how much land has been used and the number of trees chopped down (not helping the environment) by property developers and even more on the cards in the Dacorum area, I live in Bovington and by the looks of it in another five to ten years Bovington will have doubled in size, as with many other areas in West Herts, we don't need more supposedly affordable housing built by property developers, we need more council houses, (how many are on the councils waiting list?) what is desperately needed is a New Hospital, so let's have some of the land used to build a new hospital and not so many houses.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2012

**Person ID** 1262719

**Full Name** Richard Lythaby

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2048
<b>Person ID</b>	1262738
<b>Full Name</b>	Alan Pierce
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	Tring is not well placed to deliver much greater growth. It neither has the infrastructure nor the employment opportunities.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2085
<b>Person ID</b>	1262755
<b>Full Name</b>	Karen Johnson
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spacial Strategy for Growth. Spatial Strategy for growth sets out the number of homes to be built and where to be located excluding windfalls 64% will be on green belt (77% on greenfield) including 2200 at Berkhamsted of which 80% will be on new green belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of vast swathes of Green Belt. This proposed overdevelopment will also destroy our market towns character.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2102
<b>Person ID</b>	1262762
<b>Full Name</b>	Eric Dodman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	In terms of 5.2, I would expect my Council to push back on any government strategy that impacts the overall nature of our beautiful Market towns. Furthermore, the fifth bullet point within 5.2 heavily implies that you expect both Berkhamsted and Tring to become more like Hemel Hempstead in terms of look and feel. I would say that your "spatial strategy for growth" shows no concern for the future of the Market towns your oversee. It is clear you are adopting a smash and grab policy to minimise the thought you have to put into it. In addition, I can see no way that this plan minimises the impact on Green Belt or AONB. Re 5.5, I think you need to look again at your plan for Tring. The vast majority of the new builds will be on Green Belt and open farm land. The words you use throughout your document are not supported by the reality of what you say on development. Point 5.7 is absolute rubbish. Tring, in particular, will be vastly changed

as a result of your plan. There is no way that the existing public transport in Tring will be up to the job, especially if your plan is to bring in people who have no transport of their own.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2110

**Person ID** 1262797

**Full Name** NICK TURNER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and

infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamsted, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2156
<b>Person ID</b>	1261286
<b>Full Name</b>	John Saner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>Spatial Strategy for Growth comment</b>	<p>The driver for growth envisaged in the plan is the requirement to provide more housing. It is assumed that with more people there will be more employment. This does not necessarily follow. In fact the driver for growth is more likely to be employment-led not the arbitrary decision to build more houses.</p> <p>Employment patterns are bound to change following the pandemic and the demonstration that remote working for at least part of the time is feasible and desirable. The consequence of this is likely to be that if people can work remotely they will not need to live in expensive areas near to London and may move to cheaper areas. Hence the demand for extra housing may not materialise or may not do so to the extent envisaged.</p> <p>If population growth is not as great as envisaged it follows that the demand for retail space will not be so great. This coupled with the acceleration of the trend to online shopping may lead to a reduction of demand for retail space.</p> <p>The pandemic will lead to changes we cannot envisage. The most sustainable development for the foreseeable future will be based on flexibility and the adaptation of the current building stock, particularly current retail and office premises, to residential.</p> <p>The pressure on the AONB, particularly Ashridge forest, as a result of the increase in the number of people visiting the area during the pandemic is a demonstration of damage that can be caused by overuse of important and beautiful natural landscape. Encouraging the population of Dacorum to grow by 20% by building 17,000 new homes will put unsustainable additional pressure on Ashridge and the surrounding AONB.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2170
<b>Person ID</b>	1262765
<b>Full Name</b>	Paul Rees
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The number of new homes envisaged by the spacial strategy should be halved in order for this plan to be sustainable - otherwise it will simply add to the global climate and ecological crisis. Villages such as the historic Kings Langley - which was the capital of England during the late 1370s - should be cherished for what they are: villages, where man and nature are in close contact. With reference to Kings Langley in particular, the idea that a village which already had more than</p>

5,000 inhabitants should accommodate an additional 275 homes (which would add approximately another 1,000 to the population) is wrong-headed and shocking. Kings Langley needs to be protected against further development, otherwise it will lose its character as a village and will come ever closer to being subsumed by Hemel Hempstead in one direction and Watford in the other direction. The proposed development at Rectory Farm is far too big and overpowering for a village such as Kings Langley and should be rejected even at this late stage. New homes should only be built on brown field sites in densely populated areas.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2193

**Person ID** 1262841

**Full Name** Nada Ryan

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** DBC has incorrectly taken the housing numbers as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2219

**Person ID** 1262860

**Full Name** Susanne Rees

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	The spatial strategy for growth exhibits the same old thinking based on the tired and erroneous idea that growth is good. Climate change and loss of biodiversity show us that the continued obsession with growth is not a good thing in fact it is a driver of ecocide. Therefore, I would urge Dacorum to halve the number of new homes envisaged in this plan and plead that all villages in green belt areas (including Kings Langley) are protected against large scale development. The proposal to build at least 275 new homes in Kings Langley would, if enacted, totally change the character of Kings Langley as an historic village - from where England was governed during the late 1340s. I would urge Dacorum to hugely scale back its overall housing numbers and in particular scale back the number of new homes that are proposed for Kings Langley. The building of 275 new homes in Kings Langley would add around 1,000 people to the total population of this historic place and fatally undermine its current character: which is that of an historic village.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2254
<b>Person ID</b>	1262697
<b>Full Name</b>	Gillian Lindley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	Spacial Equality in Dacorum. The percentage increases in housing stock across the Borough is biased very heavily on Tring, there being proposed an increase of approximately 50% increase, compared with Berkhamsted, for instance, at less than half of this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2282
<b>Person ID</b>	610662

<b>Full Name</b>	Mr Antony Harbidge
<b>Organisation Details</b>	Chairman Berkhamsted Residents Action Group (BRAG)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Paragraph 5.5 states <i>“The Growth Strategy for Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.”</i></p> <p>This paragraph makes no sense in the context of the actual Plan and proposed sites, which for Berkhamsted are mainly valley wall and ridge-top sites situated at a distance (3-4km) from the town centre. These, by definition are located at a distance away from <i>“passenger transport and other services, facilities and employment opportunities.”</i></p> <p>Indeed, despite promoting massive growth, the Draft Local Plan offers no proposals for any growth of employment opportunities in Berkhamsted, thus promoting what realistically will be increased high-carbon travel for work.</p> <p>The 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted <i>“has to be balanced against the need to protect the town’s historic character and setting”</i>, but while paragraph 5.5 offers some protection for the ‘historic character’ of the town it offers no protection for the town’s setting.</p> <p>BRAG does not agree with Policy SP2. The headline target of ‘A minimum of 16,596 homes’ is simply wrong.</p> <p>BRAG understands that the figure is based on the Government’s method of calculating housing ‘need’ for an area, which is/was 922dpa (potentially usurped by 1023dpa), but at this point there is no need to argue the rights and wrongs of the algorithm employed by Government (that should have been done within DBC’s evidence base – see section 26), because it is not a strict target set by Government. These numbers CANNOT be used to take land out of Green Belt – they do not represent <i>“exceptional circumstance”</i>.</p> <p>Government has made it crystal clear that the numbers are a starting point only and it is up to Local Authorities to know if local constraints such as Green Belt means that the numbers cannot be delivered.</p> <p>There are many examples that could be used, but BRAG has limited itself to highlighting just six examples of guidance issued by Government that shows the policy on Green Belt protection is clear and unambiguous:</p>

- The NPPF provides protection for Green Belt and the land due to be released around Berkhamsted clearly pass the tests.
- In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming *“demand for housing alone will not change Green Belt boundaries”*.
- Paragraph 9 of the 2017 DCLG *“Planning for the right homes in the right places: consultation proposals”* 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.”*
- On December 16th 2020 the Government published a response to the recent white paper consultations. With reference to protected landscapes and Green Belt it states *“We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”*
- The same response goes on to state *“We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.”*
- And further clarifies *“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’s sole justification for accepting Government’s numbers (922dpa) as a strict target is simply that *“Any option below the standard methodology would have to be robustly justified”* (paragraph 5.8 of The Development Strategy Background Topic Paper).

Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, BRAG fails to understand why DBC Planning felt unable or unwilling to make a case that can be *“robustly justified”*.

DBC have seem to mis-understood their responsibilities. Paragraph 136 of the NPPF is clear *“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”*, and not the other way round.

Paragraph 19.6 of the Plan does say *“In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries.* But, beyond that statement there is absolutely no justification offered, except the Government ‘target’ that isn’t actually a ‘target’.

Readers of paragraphs 19.6 and 19.7 in the ‘Managing Development in the Countryside’ section are directed to the Sustainable Development Strategy chapter of the plan for justification, but BRAG is at a loss to see anything in paragraphs 4.1, 4.2, 4.3 or Policy SP1 that could remotely be described as “*fully evidenced and justified*” as required by the NPPF.

Indeed 19.7 also specifically states DBC have “*identified those areas on the edge of the main settlements where exceptional circumstances exist*”, thus inferring that exceptional circumstances exist for the settlements protected by the specific Green Belt releases. *These “exceptional circumstances”* are certainly not evidenced.

If the SP2 target is allowed to stand, latest ONS statistics confirm that DBC are planning for a massive oversupply compared to local need at the expense of valuable and irreplaceable Green Belt land, potentially as much as 850 hectares.

The 2018-based household projections suggest an annual household need figure of 341 for Dacorum, while The Development Strategy Background Topic Paper identifies 10,954 (609dpa) urban housing supply over the Plan period.

So, using DBCs own figures for identified housing supply, developing in urban areas only will produce a 78.6% uplift in housing supply above the ONS identified need for Dacorum. There are clearly no exceptional circumstances with regards to housing supply in Dacorum.

Indeed, if we look further at the DBC’s figures it is noted that DBC have included just 2,408 windfalls (133.8dpa) of the total 10,954 urban homes (22%), but over the last 14 years, the Urban Capacity Study shows windfalls have come on-line at the rate of 306.2dpa (4,287 total). DBC have effectively reduced their windfall expectation by a massive 56%. To put it plainly if windfalls continue at the same rate, urban capacity will produce a total of 14,059 homes or an annual rate of 781.1dpa.

BRAG accepts that a cautious approach by DBC on windfalls may be prudent in normal circumstances and that past completions may not be repeated at the same rate, but we are entering a post-pandemic time with altered working practices that will surely lead to more change of use developments. Reducing windfall projects to the level that DBC has is impossible to reconcile with the facts and clearly shows that the destruction of 850 hectares of Green Belt is totally unjustified.

Statement 2 in SP2 starts “*The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring*”. BRAG is concerned about this wording as in its current form it suggests that ‘*investment*’ will be focused on Hemel Hempstead and that investment will be supported by the growth at Berkhamsted and Tring.

Certainly, historically infrastructure investment in Berkhamsted has not matched housing growth, while the majority of funds raised through s106 from developers compensating for the failure to build affordable housing and the Community Infrastructure Levy (CIL) payments have gone into Dacorum’s coffers for funding investment elsewhere.

With much higher CIL payments in Berkhamsted than elsewhere in Dacorum, it is easy to see the fiscal attraction of promoting development in Berkhamsted, but if that is a driver then it is wrong.

Statement 3 in SP2 states “*The majority of new growth and investment will be concentrated in sustainable locations*” and continues “*Berkhamsted will accommodate growth of at least 2,200 new homes. Development will enhance the town*

*centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.”*

However, the vast majority of this growth is to be sited on valley side and ridge-top Green Belt land sited at a distance (3-4km) from the town centre and railway station, with significant gradients (some in excess of any gradient on the Tour de France!) that will only promote high-carbon forms of travel rather than the stated preference of walking and cycling.

Indeed paragraph 23.119 accepts that *“congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.”* And in paragraph 23.120 goes on to concede that *“There are few opportunities for new road capacity in the town.”*, while offering one of two solutions *“The careful location of new development and promoting opportunities for sustainable travel, will in part help tackle a number of parking and traffic issues.”*

If it was not so destructive the wording *“careful location”* would be comic. BRAG repeats that these sites are located at a distance (3-4km) on valley side with very steep gradients and ridge tops. They can only be regarded as carefully selected locations if the express aim was to deter walking and cycling.

The second solution offered comes in the form of the ‘Berkhamsted and Tring Sustainable Transport Strategy’ (Paragraph 23.122) but again the report has absolutely no ‘Sustainability’ credentials. Rather it simply concedes defeat for Berkhamsted by merely outlining junction enhancements at relatively minor side roads and crossings within the urban area and new/widened footpaths along Shootersway.

BRAG has already addressed the flawed numbers proposed by DBC as a whole across the Borough, but we specifically object to the target of *‘at least 2,200 new homes’* for Berkhamsted and Northchurch.

The adopted Core Strategy identified growth of 1,180 homes over that plan’s 25-year lifespan, which equates to 47.2dpa. In reality, Berkhamsted has contributed to the Dacorum’s new housing stock at a rate of 61.9dpa – in other words completions have out-performed the target by 31.2% in Berkhamsted while new housing stock in Hemel Hempstead has fallen behind the town’s target by 9.3%.

Much of this can be explained by developers’ demand to build in Berkhamsted rather than satisfying need, i.e. Berkhamsted growth is becoming developer led rather than planning led and this Draft Local Plan as proposed is facilitating that process.

BRAG contests that given its current size and topography, Berkhamsted has reached its limits of capacity. As conceded by DBC, the town centre already suffers from congestion and poor air quality (data for Lower Kings Road shows the level of NO<sub>2</sub> in some periods exceed the 40micrograms/cm<sup>3</sup> limit).

Building more edge of town developments on valley side/ridge-top Green Belt locations at a distance (3-4km) from the town centre and railway station to satisfy flawed housing targets is not sustainable in any sense of the word. These plans will not enhance the quality of life for residents current or future.

**Included files**

**Title**

Spatial Strategy for Growth

<b>ID</b>	EGS2300
<b>Person ID</b>	1261830
<b>Full Name</b>	alistair budd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>A much more creative look needs to be taken in the search for deveoped land that can be repurposed for housing . This strategy does not go far enough .</p> <p>Turning the market towns of Berkhamsted and Tring into an area that will become in time Greater Hemel Hempstead is a terrible folly .</p> <p>para 5.5 .Most of the Berkhamsted sites along Shootersway are clearly not located close to transport,facilties , services and employment .There are other examples, but it shows again total disconnect between Strategic words and site plans .</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2335
<b>Person ID</b>	1262957
<b>Full Name</b>	Gregory Hukins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	I dont agree that the plan seeks out opportunities to maximise the amount of development on previously developed land within exisiting urban areas. The proposed inclusion of geenbelt land in Berkhamsted Northchurch and Tring goes against this principle. The plan changes the role and character of the villages, one of the key attributes of Northchurch and Tring is their semi rural aspect with rich environmental settings of AONB and Ashridge estate, the plan will diminish their character. The plan does not minimise the requirement for development on Green Belt land the impact on the Chilterns AONB and protected sites. Development of site 18 will maximise the impact on Green Belt, impact on AONB and disturb Grims ditch protected historic environment.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2343
<b>Person ID</b>	1262981
<b>Full Name</b>	Chris Mabley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>By referring to targets for housing growth, DBC seems to imply only the numbers matter and neglects the smaller developments in less sustainable locations which seem to fall outside the strategic plan.</p> <p>Better would be precise definition of what is sustainable in wider terms. A huge housing development along the Gade valley is not sustainable in landscape, environment terms.</p> <p>Small developments in a patchwork on the southern side of Berkhamsted impact less on the green agricultural buffer between Berkhamsted and Bourne End and DBC planners have more chance of imposing conditions on small developers than on big concerns like Barratt Homes, Wimpey, Bovis or Thakeham who have their own agenda.</p> <p>Providing growth for transformation for Hemel Hempstead seems to mean urban sprawl and obliteration of its New Town infrastructure. There is no evidence of how important market town or larger villages can balance growth to complement delivery of anything but sprawl because infrastructure is predicated on future growth rather than existing need.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS2350
<b>Person ID</b>	1262996
<b>Full Name</b>	Ian Bramley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>This Local Plan is a shocking environmental disaster, wrecking our local Green belt with unforgiveable, massive expansions of Hemel, mainly along the beautiful Gade Valley, ditto in Tring etc. Proposing 16,899 new housing units in Dacorum means a population increase of some 50,000 people, and years of construction dirt, pollution and traffic for existing residents. All the plans's claims of Sustainability, Environment Preservation and similar worthy terms, are in reality 1984-style untruths, grossly misleading, and in most case the opposite. Whilst infilling and redevelopment within town boundaries is acceptable, this proposed wholesale destruction of huge swathes of prime countryside/farm land is appalling. Which Hemel residents have voted in favour of such huge overdevelopment? Where will adequate water supplies be sourced from, without damaging precious local chalk streams. What have Hemel agreed to host massive St Albans District Council housing developments right beside Hemel. Increased traffic congestion, much greater air pollution, and lack of adequate services (schools , doctors, etc will result.</p> <p>.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2352
<b>Person ID</b>	1262244
<b>Full Name</b>	Estelle Wraight
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Use brownland not Green Belt land. You are planning to use fields that are unfit for building.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2367
<b>Person ID</b>	1261821
<b>Full Name</b>	Chris Cole
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The objective is in "providing growth in the villages that reflects their role and character." The same considerations should apply to the towns of Tring and Berkhamsted. There is no reason why they should bear an inordinate share of the development - nobody wants new housing developments foisted on them, the burden should be shared equally across the borough Infrastructure in terms of schools and roads etc will have to be built wherever the new housing is built - if it can be provided in Tring and Berkhamsted, it can be provided in Bovingdon, Kings Langley and Markyate, which it is proposed will suffer only a couple of hundred houses each.</p> <p>No justification is given for rejecting large-scale development outside the existing towns and large villages - there is plenty of space in Dacorum for new towns and villages.</p> <p>A major issue is the destruction of Green Belt around Tring, Hemel Hempstead and Berkhamsted. You do not "manage landscape and Green Belt impacts" by destroying them. Green Belt should be sacrosanct, otherwise what is the point of having it at all. If you can concrete it over in Tring, Berkhamsted and Hemel, why not in the rest of Hertfordshire?</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2397
<b>Person ID</b>	1263028
<b>Full Name</b>	jennifer summerfield
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>GREEN BELT LAND SHOULD NEVER BE RELEASED FOR DEVELOPMENT. WE NEED TO SEE GREENERY!</p> <p>As per your own document, Bovingdon is already constrained with regard to infrastructure, the doctors' surgeries are full, the local school is full, there is no car park for the High Street and we have an ever-increasing number of vehicles using our village (eg due to the Open Market, Dancing on Ice, film-making etc).</p> <p>Increasing the number of homes built in Bovingdon must not be used as an argument for improving the infrastructure. The high street is already gridlocked on many occasions, and Green Lane (in particular) is fast becoming a single-lane road at the junction of the High Street. Large builders merchant lorries are increasingly using Green Lane to get to EH Smith.</p> <p>240 new homes in Bovingdon means an extra 240+ cars on the road. Expecting people to ditch their cars is a fools errand.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2404
<b>Person ID</b>	1227518
<b>Full Name</b>	Mr John LOWRIE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2483
<b>Person ID</b>	1262731
<b>Full Name</b>	Julie Battersby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The <b>proposed number of homes to be built across Dacorum and the total scale of the development are unacceptable</b>. The term '<i>our requirement</i>' is also inappropriate. The local authority has the discretion to disregard and downscale government targets for housing development that relies on release of Green Belt Land and indeed, the Council has not met the necessary requirement to prove that exceptional circumstances apply in order to release the stated quantity of Green Belt land for development. I have supplied evidence that actual need is approximately half that stated and so I would support the delivery across Dacorum of 8,300 dwellings plus additional small scale windfalls and no more at present. <b><i>The Local Plan should be withdrawn, revised based on reduced housing estimates and resubmitted with the majority (approx. 83%) of Green Belt land sites removed.</i></b></p> <p>The policy of "Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough..." contradicts one of the fundamental principles of local government democracy, namely to represent the views of constituents. Whether or not a settlement chooses to make a significant contribution to the Strategy for Growth is a matter for that community and they should not be bullied, coerced or deceived in that respect. <b>I regard the proposed number of dwellings in and around 'Berkhamsted' to be excessive and unnecessary</b>. Allowing for an 83% reduction in Green Belt land required based on the proposed dataset revision and adding together the balance and non-Green Belt site housing totals would mean that a fair contribution from the 'Berkhamsted' area is 272 homes</p>

$((1750*0.17)+40+86=424)$ . I support a target for Berkhamsted of approximately 424 homes plus windfalls over the duration of the Strategic Plan.

If the above actions are taken then I would have faith in the value of the very important section 5.3 statement “Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites”;

The principle should include “.....and in particular, *decreasing unmet need for social housing* and increasing the number of new and genuinely affordable homes in the Borough”. There should be increased focus on producing a larger proportion of 1 to 3 bedroom homes within housing developments to achieve this.

Classification of a site as ‘urban’ prejudices the outcome of the consultation because it leads residents to believe that the site has already been built upon, or is less attractive, or is generally less worth preserving than a non-urban site. Throughout the Local Plan there are references to ‘urban’ areas and this includes sites on the periphery of towns and villages that are currently farmland, or open greenspace surrounded by hedges and/or bordered by lanes. Public perceptions of such sites are that they are ‘rural’ or ‘semi-rural’ not ‘urban’ – and this is certainly the case in Northchurch and Dudswell and for me personally. In the section named “How **not** to use the Rural and Urban Classification” of the Crown Publication “Rural and Urban Classification Guide 2004”, users (planners) are cautioned against applying a classification term that does not agree with what local residents think about their area. *The Local Plan should be withdrawn and resubmitted with peripheral sites of settlements re-classified in accordance with public perception as semi-rural or rural.*

Having established this principle, encouraging *substantial* increases in heights and densities in genuine brownfield urban sites is a concern. The tower blocks in Hemel Hempstead are still an eyesore despite recent attempts to make them more attractive and given the clear added dangers of high rise living that are now well known following the Grenfell disaster, I wish to see **a maximum height of buildings as being no more than five storeys** and then in incremental steps from the edge of the development so as not to dominate surrounding housing. In areas the public regard as semi-rural, which the Local Plan categorises as urban, I would want to see no more than three storey buildings and then only when there is existing screening by mature trees or natural land contours. I have no objection to high density in principle where hedgerows are preserved with 10m -15m undeveloped adjacent buffer zones if it does not impact on vulnerable species, wildlife sites, wildlife corridors, AONB’s, other special sites or the beautiful views across and down the valley.

Regarding net loss of office space, surely it is better to convert to housing than remain empty if there is sustained insufficient demand? Suggest amending statement to “No *permanent* loss of office floorspace from 2025 onwards *unless there is a sustained reduction in demand.*”

I support the addition of future windfalls to the Plan targets. I believe the actual number is likely to be significantly higher than that stated due to the predictable increase in the rate of release of small business premises that fail because of Covid.

**5.4 & 6 No Green Belt land should be automatically released or de-designated in anticipation of future needs beyond the duration of this plan other than sites expressly declared and approved in this 2021-38 Local Plan**

**process.** DBC’s Green Belt Review shows an alarming number of sites adjacent to those in the Local Plan that will also be released if those in the current Local Plan are approved for development. This is tantamount to planning for additional homes by stealth and does not meet the standards of transparency expected by constituents. This secondary release policy should be explicitly stated in the Local Plan and all such additional sites clearly shown in the Plan. Population growth and maintenance of predicted levels of need are not inevitable. There are predictions that global population levels will naturally fall in 20 to 30 years’ time and that this phenomenon is expected to be particularly strong in developed nations, as it is currently in Japan.

**5.5** In the opinion of my family members and neighbours the growth strategy for Berkhamsted already pursues an urban intensification agenda and does detract from the character of market town and village locations. Just a few fields prevent merger of the ribbon development along the valley. If this is lost we will also lose the distinction in character between the town of Berkhamsted, the village of Northchurch and the hamlet of Dudswell with each other and also with the neighbouring small settlements of Bourne End and Cow Roast. In order to retain that character, existing Berkhamsted and Northchurch Green Belt sites closest to these settlements should be withdrawn from the Local Plan.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2492
<b>Person ID</b>	1263094
<b>Full Name</b>	Bill Scott
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Government policy has changed, but your strategy is still based on the old policy.  This plan is developing Tring in a completely disproportionate way. Tring is a small town and should not have to take on so much of the borough's development. This plan would fundamentally harm the character of the town and is taking a huge amount of green belt land. Tring's infrastructure cannot cope with such an expansion.  There are too many houses in this plan, and too few jobs to go with them.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2497
<b>Person ID</b>	1263101
<b>Full Name</b>	Richard Hall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I agree that Berkhamsted and Tring need to pull their weight alongside Hemel.</p> <p>I agree that urban intensification of Berkhamsted and Tring is bad.</p> <p>But are the numbers of new houses right?</p> <p>SP2 1e - You need to be clearer with associated infra. This must be priority ONE.</p> <p>SP2 3b - 2200 is too many.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2521
<b>Person ID</b>	222269
<b>Full Name</b>	Georgina Tregoning
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b>	Yes

* No	
<b>Spatial Strategy for Growth comment</b>	I do not believe that the growth planned for Tring is proportionate or sustainable, especially in view of the fact that there appears to be no provision for increasing the width of the roads through central Tring; and in overall terms, the demands for water in the East of England will be impossible to fulfil.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2537
<b>Person ID</b>	1159198
<b>Full Name</b>	Edward Hatley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2540
<b>Person ID</b>	1263174
<b>Full Name</b>	katey adderley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	DBC seems not to have understood that this is a TARGET and in the case of Berkhamsted simply not possible without building a large proportion on Green Belt
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2551
<b>Person ID</b>	1263183
<b>Full Name</b>	Claire Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	This section says "minimising and managing the requirement for development on Green Belt land" and yet, a significant number of houses are planned to built on Green Belt land, with no allowance for the creation of new brownfield sites as a result of COVID. Many people are not going back to work in the same way they did before the pandemic, our high streets and business parks may be unrecognisable, and may provide an opportunity to provide housing, instead of retail/restaurants/offices.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2567
<b>Person ID</b>	1262037
<b>Full Name</b>	Jason Silver
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The building on green belt land around Berkhamsted is not acceptable. The numbers of buildings projected, are requiring the building on green belt land and this should not be the answer. The Green belt is there for a reason and has special status and should not be built on
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2591
<b>Person ID</b>	1263206
<b>Full Name</b>	Andrew Farrow
<b>Organisation Details</b>	Great Gaddesden Parish Council
<b>Agent ID</b>	1253616
<b>Agent Name</b>	Andrew Farrow
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Spatial Strategy for Growth</b></p> <p>We understand that the Spatial Strategy for Growth was driven by a Government requirement for 922 dpa derived from the Strategic Housing Market Assessment (SHMA) as set out in the Planning Reform white paper published in August 2020 together with the Office for National Statistics (ONS) estimate of housing needs from 2018.</p> <p>We have been advised by officers that the SHMA derived target is non-negotiable, and yet we note that on the 16th December 2020 the Minister stated that the Ministry's projected house building numbers are not a target<sup>3</sup> and the South West Hertfordshire SHMA cited in the Housing Policy (Supply and Delivery) Topic Paper (s. 2.39) states that:</p>

“The SHMA does not set housing targets. In effect, national policy sets out that development needs should be assessed leaving aside constraints (Stage 1) which is what the SHMA does. This is then brought together with evidence related to land availability, environmental and policy constraints (including Green Belt)”

The Housing Policy (Supply and Delivery) Topic Paper also states that:

"The Government ... recognised that Local Authorities may not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere (2.21)

The Government ... in its recent consultations on the Planning Reform White Paper and related changes to the planning system ... (6.23)

... identifies the following factors that will form part of these adjustments (to housing requirement numbers) ..... the extent of land constraints in an area, including ... the Green Belt ..." (6.28)

The Housing Policy (Supply and Delivery) Topic Paper cites the new revised standard method (of the White Paper) in order to arrive at a local housing need to 922 homes pa (6.26). However, the White Paper Consultation document referred to states that:

"The new standard method should ensure that all areas of the country are encouraged to build the homes their communities' need." (19)

Where is the evidence that Dacorum “needs” these additional homes? Particularly as responses received during the 2017 Dacorum consultation were summarised in the Housing Policy (Supply and Delivery) Topic Paper (s. 5.11) as:

“There was significant support from key stakeholders, Town and Parish Councils, individuals, resident action groups and other organisations for protecting the Green Belt from development.”

When the Government withdrew its SHMA proposals in December 2020, the Housing Secretary, Robert Jenrick, said in his statement to the House of Commons:

“We heard clearly through the consultation that the building of these homes should not come at the expense of harming our precious green spaces. We also heard views that this need can be better met in existing urban areas.”

We understand that when the Government withdrew the August 2020 SHMA it determined both to revert to the previous SHMA and also to the ONS figure for housing need from 2014. Whilst we understand that the Government has stipulated the use of 2014 ONS data, this is contrary to the National Planning Policy Framework which states (s. 31) that all policies:

“should be underpinned by relevant and up-to-date evidence ....”

Far from achieving the Government’s objective of saving “our precious green spaces” the net result of the December 2020 change in policy was to increase Dacorum’s housing target to 1,023dpa along with an increase in Hertfordshire’s target by 19% whilst all other Home Counties targets are reduced from Surrey (-6%) to Sussex (-23%). Using the 2018 ONS data with the pre-August 2020 SHMA by contrast would reduce the target to a far more realistic 497dpa.

In summary:

- we do not believe that Green Belt land should be used for development.
- we urge the Council to 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.

### **Urban Growth Capacity**

We are concerned that the 2017 Issues and Options consultation identified the potential for 476 dpa from Urban Growth and that after review this increased in the Development Strategy Topic Paper to c. 600 dpa or 10,954 homes (s.5.12). But in the main plan document (7.7) Urban Growth Areas are only quoted as 5,638 (or 313 dpa).

As the National Planning Policy Framework (NPPF) requires that the Plan fully explores the potential to make effective use of urban land (paras 118 and 137) , especially before considering the exceptional circumstances needed for releasing Green Belt land for housing purposes. Clearly the capacity to build an additional 5,000 houses in Urban areas would have a material impact on the plan, whatever the housing target.

### **Delivering the infrastructure to support growth**

Clearly when considering a proposed 25% increase in population the provision of adequate infrastructure is key, but there are only three pages about infrastructure development in the Plan (pp 49 – 52) and the Infrastructure Development Plan is incomplete (10.5).

We have a significant concern with the impact of the new transport corridor to the north of Hemel Hempstead and through the North and East Growth Areas (10.4) linking Leighton Buzzard Road to J8 on the M1 to be used by traffic from Tring and Berkhamsted and the Hemel Garden Communities. Despite the fact that the most direct access routes from the A41 to the new link road are all extremely restricted by single-lane bridges and tunnels, we are concerned that the alternative (south down the A41 to the A4146 junction, north up the A4146, east across the north of Hemel Hempstead and then south to J8 – see the attached map) is significantly longer and will result in increased traffic flows through Great Gaddesden Parish.

Broadly speaking it appears that Hemel Hempstead’s traffic problems are to be exported to Great Gaddesden, Potten End and Berkhamsted. This is unacceptable.

We cannot support a Plan with inadequate information regarding the infrastructure developments required to deliver it.

<b>Included files</b>	<a href="#">Possible traffic flow map.png (1)</a>
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2618
<b>Person ID</b>	1145686
<b>Full Name</b>	Mrs Sarah Gray
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The 2200 houses proposed for Berkhamsted will change the nature of the market town, not for the better. Over recent years the town has expanded by building on Brown field sites. This plan proposes building on green field sites. The South Berkhamsted site, which was previously known as the South Berkhamsted Concept in recent planning history, has not changed its location, or access to the town changed since the application was turned down before. In fact the town has become busier and the ability of the inhabitants of 800 houses trying to access the town more difficult.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2640
<b>Person ID</b>	1263231
<b>Full Name</b>	Mr Phil Robinson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation</p>

rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2655

**Person ID** 1263235

**Full Name** Mrs Vanessa Robinson

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was</p>

appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2666

**Person ID** 1161597

**Full Name** Stuart Mears

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of

further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2676

**Person ID** 1263237

**Full Name** Dr Alice Mears

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was</p>

appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2685

**Person ID** 1263240

**Full Name** Stuart and Val Burnett

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

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No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2694

**Person ID** 1263241

**Full Name** Mr Stephen Hurley

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was</p>

appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2697

**Person ID** 1262737

**Full Name** Andrew Cassels

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**5.2:**

2nd bullet: The provision of light industrial sites should precede the development of housing so that commuting, and therefore congestion and pollution, is reduced.

5th bullet: The geographical constraints of Berkhamsted limits development to the east and west forcing traffic to the middle of Berkhamsted and through Northchurch to access the A41.

6th bullet: What on earth does that sentence mean? You must speak in plain, easily understood that says what you mean.

**SP2**

3b - 2,200 new homes in Berkhamsted is a significant increase in homes and associated people and cars; around 20+%. The Council missed an opportunity to develop Berkhamsted town centre when Waitrose was allowed to build a superstore

in the centre of town. It would good to understand why Tesco wasn't allowed to develop a site on the edge of town and Waitrose allow to develop one in the centre. Move Waitrose out and use that area as an off-road retail and social space. 3c - Tring has already been over developd with housing with the town centre ignored which is now dying. The Council must develop the infrastructure before increasing the housing. 2,700 houses is a 50+% increase in the population...develop the twon centre and create employment opportunities in new light industrial sites first....please.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2706

**Person ID** 1263245

**Full Name** Mr Paul Barritt

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

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<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2716
<b>Person ID</b>	1263247
<b>Full Name</b>	Giselle Okin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	I don't think the plans are minimising the impact on green belt use neither do they seem to be reflecting the character of the area. 'Ensuring Berkhamsted and Tring play a greater role in delivering growth seems to mean shouldering a disproportionate burden for the size of these towns. Berkhamsted does not have the infrastructure to cope with the level of growth being planned. The development already in progress is already testing the limits of the road infrastructure with traffic and pollution.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2744
<b>Person ID</b>	1263270
<b>Full Name</b>	James Thornton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The growth in Tring is ridiculous. Building 2700 new homes will put too much strain on current infrastructure.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2756
<b>Person ID</b>	1262722
<b>Full Name</b>	Colin McCready
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2867
<b>Person ID</b>	1263425
<b>Full Name</b>	Andrew Farrow
<b>Organisation Details</b>	Nettleden with Potten End Parish Council
<b>Agent ID</b>	1253616
<b>Agent Name</b>	Andrew Farrow
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We understand that the Spatial Strategy for Growth was driven by a Government requirement for 922 dpa derived from the Strategic Housing Market Assessment (SHMA) as set out in the Planning Reform white paper published in August 2020 together with the Office for National Statistics (ONS) estimate of housing needs from 2018.</p> <p>We have been advised by officers that the SHMA derived target is non-negotiable, and yet we note that on the 16th December 2020 the Minister stated that the Ministry's projected house building numbers are not a target<sup>3</sup> and the South West Hertfordshire SHMA cited in the Housing Policy (Supply and Delivery) Topic Paper (s. 2.39) states that:</p> <p>"The SHMA does not set housing targets. In effect, national policy sets out that development needs should be assessed leaving aside constraints (Stage 1) which is what the SHMA does. This is then brought together with evidence related to land availability, environmental and policy constraints (including Green Belt)"</p> <p>The Housing Policy (Supply and Delivery) Topic Paper also states that:</p> <p>"The Government ... recognised that Local Authorities may not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere (2.21)</p>

The Government ... in its recent consultations on the Planning Reform White Paper and related changes to the planning system ... (6.23)

... identifies the following factors that will form part of these adjustments (to housing requirement numbers) ..... the extent of land constraints in an area, including ... the Green Belt ..." (6.28)

The Housing Policy (Supply and Delivery) Topic Paper cites the new revised standard method (of the White Paper) in order to arrive at a local housing need to 922 homes pa (6.26). However, the White Paper Consultation document referred to states that:

"The new standard method should ensure that all areas of the country are encouraged to build the homes their communities' need (19)."

Where is the evidence that Dacorum "needs" these additional homes? Particularly as responses received during the 2017 Dacorum consultation were summarised in the Housing Policy (Supply and Delivery) Topic Paper (s. 5.11) as:

"There was significant support from key stakeholders, Town and Parish Councils, individuals, resident action groups and other organisations for protecting the Green Belt from development"

When the Government withdrew its SHMA proposals in December 2020, the Housing Secretary, Robert Jenrick, said in his statement to the House of Commons:

"We heard clearly through the consultation that the building of these homes should not come at the expense of harming our precious green spaces. We also heard views that this need can be better met in existing urban areas".

We understand that when the Government withdrew the August 2020 SHMA it determined both to revert to the previous SHMA and also to the ONS figure for housing need from 2014. Whilst we understand that the Government has stipulated the use of 2014 ONS data, this is contrary to the National Planning Policy Framework which states (s. 31) that all policies:

"should be underpinned by relevant and up-to-date evidence ...."

Far from achieving the Government's objective of saving "our precious green spaces" the net result of the December 2020 change in policy was to increase Dacorum's housing target to 1,023dpa along with an increase in Hertfordshire's target by 19% whilst all other Home Counties targets are reduced from Surrey (-6%) to Sussex (-23%). Using the 2018 ONS data with the pre-August 2020 SHMA by contrast would reduce the target to a far more realistic 497dpa.

In summary:

- We do not believe that Green Belt land should be used for development.
- We urge the Council to 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.

### **Urban Growth Capacity**

We are concerned that the 2017 Issues and Options consultation identified the potential for 476 dpa from Urban Growth and that after review this increased in the Development Strategy Topic Paper to c. 600 dpa or 10,954 homes (s.5.12). But in the main plan document (7.7) Urban Growth Areas are only quoted as 5,638 (or 313 dpa).

As the NPPF requires that the Plan fully explores the potential to make effective use of urban land (paras 118 and 137), especially before considering the exceptional circumstances needed for releasing Green Belt land for housing purposes. Clearly the capacity to build an additional 5,000 houses in Urban areas would have a material impact on the plan, whatever the housing target.

### **Delivering the Infrastructure to Support Growth**

Clearly when considering a proposed 25% increase in population the provision of adequate infrastructure is key, but there are only three pages about infrastructure development in the Plan (pp 49 – 52) and the Infrastructure Development Plan is incomplete (10.5). As result it is difficult to know how it is possible to comment.

We have a significant concern with the new transport corridor to the north of Hemel and through the North and East Growth Areas (10.4) linking Leighton Buzzard Road to J8 on the M1 to be used by traffic from Tring and Berkhamsted. The access routes from the A41 are all extremely restricted by single-lane bridges and tunnels and as a matter of some urgency we would like to understand exactly how traffic from Tring and Berkhamsted and the Hemel Garden Communities. Despite the fact that the most direct access routes from the A41 to the new link road are all extremely restricted by single-lane bridges and tunnels, we are concerned that the alternative (south down the A41 to the A4146 junction, north up the A4146, east across the north of Hemel Hempstead and then south to J8 – see the attached map) is significantly longer and will result in increased traffic flows through Great Gaddesden Parish.

Broadly speaking it appears that Hemel Hempstead’s traffic problems are to be exported to Great Gaddesden, Potten End and Berkhamsted. This is unacceptable.

We cannot support a Plan with inadequate information regarding the infrastructure developments required to deliver it.

<b>Included files</b>	<a href="#">Possible traffic flow map.png (2)</a>
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2893
<b>Person ID</b>	1263430
<b>Full Name</b>	Pru Murray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>Spatial Strategy for Growth comment</b>	<p>The plan seems to have fixated on a huge number of homes to be built in Dacorum which is way above that identified by ONS as being required in our area. Why do we need quite so many homes?</p> <p>In Berkhamsted there are plans to increase the housing stock by 25% in the next 17 years which could increase the population of the town by nearly a third. The plan refers to Berkhamsted as an historic market town, which it is and as such is constrained by its geographical and current layout which makes it difficult to increase transport links and other amenities to accommodate such a larger number of people.</p> <p>I agree with keeping development away from villages and broadly support the rejuvenation of Hemel Hempstead through a Hemel Garden City. It makes sense to develop around the business hub of Maylands Avenue where people will be able to live and work.</p> <p>Increasing the housing stock of Tring by 50% seems unbelievably excessive for what is again a small market town.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2898
<b>Person ID</b>	1258862
<b>Full Name</b>	Tim Beeby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The Plan suggests that Berkhamsted and Tring should take their 'fair share' of new housing which doesn't take into account the geographic constraints of Berkhamsted in particular and results in massive loss of Green Belt land.</p> <p>Development should be predominately concentrated around Hemel as the natural centre of local employment, transport hub, civic amenities etc</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2909

<b>Person ID</b>	1263377
<b>Full Name</b>	Jane Messenger
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I agree that any development should focus on developing brown sites. However i am concerned about the scale of the development in the more rural areas. Surely this will just mean that these areas, Tring, Berkhamstead etc just join on the the nearest town.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS2937
<b>Person ID</b>	1263440
<b>Full Name</b>	J Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	In SP2, 1), d): the reference to additional floor space needs to be balanced against the Authority's ability to promote the active use of existing stock. Whilst not directly in control of vacant units, initiatives to support them being put back into active use should be a focus. For example, grants for refurbishment of retail frontages, rates holidays for new businesses. The allocation of new homes must be balanced against the impact on the locality. For example, the developments in Tring will materially impact the character of the town from those coming to it. The authority should consider, not only in

Tring, a more spatial allocation for new housing, with pockets of smaller developments rather than large swathes of new housing.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2941

**Person ID** 1263445

**Full Name** Andrew Farrow

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2969

**Person ID** 1164709

**Full Name** Dianne Pilkington

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

Yes

## Spatial Strategy for Growth comment

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intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS2980

**Person ID** 1258924

**Full Name** Natalia Maghdoori

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3077
<b>Person ID</b>	1263499
<b>Full Name</b>	Mrs Angela Burgin

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify</p>

development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3080

**Person ID** 1151680

**Full Name** MR STUART DOWNHILL

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	I find it very hard to believe that your proposed development plan is based on such a high percentage of Green Belt Land. In my view building over this area should be avoided at all costs: this plan should be totally revised to protect this area and avoid 'joining up' our existing conurbations.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3120
<b>Person ID</b>	1263514
<b>Full Name</b>	SAM LETHEREN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p>

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3134

**Person ID** 1263498

<b>Full Name</b>	Peter Reynolds
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The areas planned for growth do not consider the interaction between the new ways of working that will result from the Covid-19 pandemic, particularly the disconnection of housing to retail and local employment that should be encouraged as a means of revitalising the centres of our communities. Opportunities to live, work and socialise without the need for transportation should be encouraged and placing such a high burden on Hemel Hempstead that will take over 10,600 new homes will impact traffic significantly to access local amenities. It must be far worse as a result of the close proximity to the planned St Albans DC growth area.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3141
<b>Person ID</b>	1263526
<b>Full Name</b>	MR NICK RIPPER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3165

**Person ID** 1263537

**Full Name** MRS SARAH RIPPER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target

does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

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<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3180
<b>Person ID</b>	1263550
<b>Full Name</b>	ANNABEL FRANCIS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p> <p>intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and</p>

infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3204
<b>Person ID</b>	1263568
<b>Full Name</b>	Mrs Suzy Hudson
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3211
<b>Person ID</b>	1263566
<b>Full Name</b>	Frances Read
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	unacceptable strategy as it's based on too high a target of new housing
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3222
<b>Person ID</b>	489021
<b>Full Name</b>	Mrs Catherine Johnson
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am emailing to express my objection to the proposed development outlined in Dacorum Borough Council's document entitled "Emerging Strategy for Growth (2020 – 2038).</p> <p>As a resident, I sincerely hope that DBC will reconsider this plan which imposes massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt and our status as an AONB (in fact the 2019 Glover report recommended that the Chilterns should be given National Park Status).</p> <p>The following are my main objections:</p> <p>1 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.</p> <p>2 Impact on infrastructure. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing. It ignores issues such as traffic congestion, education provision and healthcare requirements. The main focus for the developers of this land, will be the building of houses which will not be affordable housing or any type of social housing and instead be at the usual high price range of houses in the area. I would very much like to see housing that was ecological and affordable for our young people starting out.</p> <p>3 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. The Council that has a LEGAL duty to protect the AONB and its environs.</p> <p>4 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.</p> <p>5 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3252
<b>Person ID</b>	1155396
<b>Full Name</b>	Jane Hodgson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p> <p>intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p>

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

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<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3278
<b>Person ID</b>	1261609
<b>Full Name</b>	DEBORAH CROOKS
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The government algorithm for calculating the number of new homes required is flawed as stated in Inside housing "Councils have complained that the government's new planning formula "seems to have been made without any assessment of demographic, market needs, delivery or capacity issues".</p> <p>2. The strategy should be focusing on protecting the Green Belt to absorb carbon emissions.</p> <p>3. The increase of population will obviously have an impact on the increase of traffic and pollution that is linked to this.</p> <p>4. The quality of life will be affected by the increase in density of housing and traffic.</p> <p>The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3286
<b>Person ID</b>	1263610
<b>Full Name</b>	BRYN HENRY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p>

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intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

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Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3299

**Person ID** 1263620

**Full Name** EMMA SIMMONDS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3312

<b>Person ID</b>	1263631
<b>Full Name</b>	GAVIN NICHOL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.</p> <p>Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3327
<b>Person ID</b>	1263643
<b>Full Name</b>	IAN DESTE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
<b>* Yes</b>	

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3347

**Person ID** 1161417

**Full Name** James Pitt

**Organisation Details** Gleeson Developments Limited

**Agent ID** 1161419

**Agent Name** Kevin  
Coleman

**Agent Organisation** Director  
Phase 2 Planning & Development Ltd

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

**Spatial Strategy for Growth comment**

Whilst we do not disagree with the broad settlement hierarchy in Policy SP3 that underpins Policies SP2 and SDP4, there is a lack of clarity and justification in the Plan that explains how the actual housing requirements for the different elements have been derived.

In particular, it is unclear as to whether the specific housing requirements that are set against each settlement in Policy SP2 have been derived from a 'bottom up' approach of site selection, that has then led to the numbers quoted, or whether

the strategy has started from a notional distribution of the overall requirement of 16,600 homes between the various settlements which has then informed the site selection process.

There is no doubt that Hemel Hempstead is the 'highest order' settlement in the hierarchy, and offers the main opportunities for local employment and higher order services. But the strategy provides for 10,000 homes at Hemel Hempstead and only 2,000 at Berkhamsted, so is it the Council's case that Hemel Hempstead is effectively 5 times more sustainable as a housing location than Berkhamsted, or is it the case the Council has identified more sites for development at Hemel Hempstead? In concentrating so much of the Plan's delivery at Hemel Hempstead on a limited number of sites, this strategy also raises potential issues as it comprises a 'high risk' approach whereby any delay in delivery (in relation to matters such as land ownership, infrastructure provision and joint working) would have significant implications for the Plan as a whole.

Both Berkhamsted and Tring are grouped together in the 'second tier' of the hierarchy, but Berkhamsted is the larger town out of the two, and offers greater local opportunities for employment and service provision than Tring, but Tring has the higher housing allocation. How does the growth strategy account for the difference? The reality again seems to be that the availability of suitable sites substantially drives the Strategy, rather than the other way round.

However, when it comes to the larger villages, and particularly in the case of Bovingdon, it is known that the potential housing delivery from suitable, available and achievable and in the case of Duckhall Farm, deliverable sites exceeds what the Strategy suggests (240 units), as at earlier stages of Plan preparation, the Council has accepted that additional suitable sites exist (as evidenced by the meetings it had with respective developers/landowners in 2019/2020 and, despite its limitations, as remains evidenced by the AECOM Site Assessment Study work). Therefore if the Strategy is effectively being driven by site suitability and availability from a 'bottom up' perspective, rather than a notional 'top down' distribution, why is this approach not being similarly applied at the larger villages as it is for Hemel Hempstead, Berkhamsted and Tring?

The background Topic Paper on the Development Strategy that has been published alongside the Draft Plan states that "Growth is capped in Bovingdon to take into account congestion and parking problems on the High Street, and in particular, restricted scope to expand the primary school." This factor would not constrain development at Duckhall Farm, as it lies within easy walking distance of the key High Street facilities, and traffic from the development would not pass through the High Street when entering/leaving the village for wider trips.

However, as per our separate representation to the Bovingdon Growth Strategy, the point about primary school capacity is simply not correct, as the analysis undertaken by EFM demonstrates, and in respect of the former point, if congestion and parking in the High Street are seen as a material constraint, it is wholly inexplicable as to why the growth strategy for Bovingdon should be allocating the site that is least accessible by walking and cycling, which is furthest from the village centre, and which is therefore most likely to *increase* congestion and parking in the High Street. Again, this wouldn't be an issue with the Duckhall Farm site, as the distance to the school and the suitability of routes is conducive to walking.

Interestingly, the Topic Paper notes that Markyate is a relatively small village compared to Bovingdon and Kings Langley, and is a "relatively unsustainable location" compared to these other two key villages. How does the allocation of 215

new homes to Markyate in the growth strategy compared to 240 at Bovingdon reflect the fact that Markyate is viewed as inherently significantly less sustainable than Bovingdon?

We accept of course that under the SP3 hierarchy, the larger villages should be delivering a smaller proportion of the overall growth than the higher order settlements, but the evidence base does not provide any clear evidence to the effect that there is any material constraint that justifies the levels of growth being quoted, nor is there any internally consistent approach which explains the broad distribution between the tiers.

If the Strategy is indeed being driven by 'bottom up' site suitability, then it is essential that Policies SP2 and SP4 are clear on this and that these unit numbers are not then used in a 'circular argument' to in turn drive decisions about which sites should be allocated. As it currently stands, and as per our separate representations to the Bovingdon Delivery Strategy, the strategy for Bovingdon currently comprises one large (and poorly located) site, and one undeliverable site. The 'bottom up' strategy should identify a mix of deliverable sites to achieve an appropriate contribution from Bovingdon village.

If there is a 'top down' distribution that has guided the number of homes to be delivered in each tier, then this needs to be made clear, and the basis for the distribution set out and justified. If however it is essentially a 'bottom up' approach of site selection that then informs the Strategy, then again this needs to be made clear, and the criteria for the selection process made transparent. Without that explanation, these policies cannot be properly judged as to the soundness of the approach.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3359

**Person ID** 1263693

**Full Name** Ruth Colderwood

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Your plan states that the you wish to minimise the requirement for development on green belt land but there is a lot of development on green belt land which will then be lost for ever.

In Berkhamsted by infilling the area between the town and A41 along shootersway the impact of the number of cars trying to get in/out of the town will mean long traffic queues

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3388

**Person ID** 1263124

**Full Name** Andrew Criddle

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment** No Comment

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3396

**Person ID** 1207786

**Full Name** Anne Foster

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Spatial Strategy for Growth comment</b>	<p><b>SP1</b> and <b>SP2</b> are Borough perspectives and are not the aspirations of those who live in Berkhamsted and Tring.</p> <p>Why should the towns play a “<i>greater role in delivering growth</i>”, if the constraints of the town have not been considered and growth on the scale proposed will undoubtedly be detrimental to the lives of existing residents, as congestion increases and facilities which are already at capacity are unable to meet the additional demand.</p> <p>This seems an arbitrary statement unsupported by evidence</p> <p>How will development “ enhance the town centre and strengthen Berkhamsted’s function as a key Market town”? There are no proposals to enhance the town centre, or the Market.</p> <p>The town centre cannot expand to provide additional shops and businesses. I have found no study assessing the impact of development on this scale, on already busy town centre facilities, just an assumption that any growth adds to “ the vibrancy” of the town. Growth on this scale may, actually destroy the character of the town rather than enhance it.</p> <p>SP2 mentions new sports facilities, where will they be located? They do not appear to be associated with any of the proposed sites, though the IDP mentions pitches and changing rooms funded totally by developers.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3402
<b>Person ID</b>	1263763
<b>Full Name</b>	Adam Kindred
<b>Organisation Details</b>	CBRE
<b>Agent ID</b>	1263757
<b>Agent Name</b>	Adam Kindred
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>It is interesting to note that the key principles of the Sustainable Development Strategy make no reference to how the strategy responds to its ecological context. Furthermore, the ‘supporting evidence’ for SP2 only refers to the Spatial Hierarchy documents which principally deal with access to services and connectivity. Whilst the Spatial Hierarchy documents are key informants to the spatial strategy, pursuing this in isolation from other key evidence results in the Sustainable Development Strategy being unjustified, notably in how it responds to its environmental context.</p> <p>Noting that survey data from the Chiltern Beechwoods Topic Paper (2020) states that the greatest recreation impact on the natural resources comes from Berkhamsted, the below key principle for a step change in growth is at odds with this:</p>

*'Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations.'*

Whilst acknowledging that a greater role could be played by Berkhamsted and Tring, this has to be balanced against the recreational pressure that additional development in this location would place on the SSSI. The Sustainable Development Strategy should reflect a greater role for Kings Langley (in being the settlement furthest away from the SSSI) as a location that can sustainably accommodate more housing and complement the growth arising from Hemel Hempstead.

At present the Draft Local Plan allocates housing as follows: Tring (2,700), Berkhamsted (2,220) and Kings Langley (275). By comparison, the population of Tring is circa double that of Kings Langley but the Draft Local Plan proposes almost 10 times the amount of housing growth.

Beyond this being a key requirement to ensuring the preparation of a plan that can be found sound, Section 40 of the Natural Environment and Rural Communities Act 2006 also places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.

Paragraph 7.5 of the Draft Plan states *'We have therefore progressed the Plan on the basis of this new housing need calculation of 922 homes pa (i.e. 16,596 homes over the period 2020-38). We recognise 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.'* As previously noted in response to other questions, the draft plan should meet the requirements for 1,023pa as required by the Standard Methodology in ensuring the provision of a plan that is positively prepared.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3419
<b>Person ID</b>	1263764
<b>Full Name</b>	Katie Quaite
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	5.7 The strategy avoids directing significant development to the smaller villages and wider countryside This is not true. The village of Northchurch will be absorbed by Berkhamsted and lead to greater traffic and footfall within an Area of Outstanding Natural Beauty. It will greatly impact Ashridge and the Chilterns.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3494
<b>Person ID</b>	1263810
<b>Full Name</b>	David Tolfree
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Expansion of market towns with too many new developments within the vicinity will lead to them not being seen as a market town anymore, removing the feel and period look of them
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3495
<b>Person ID</b>	1263805
<b>Full Name</b>	Andrew Criddle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>You state as a key principle:  "Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations".</p> <p>Comment:  Your proposals fail to deliver balance in that Tring will be expected to accomodate a growth in housing of over 50% - way in excess of that in Hemel Hempstead. It would also appear that almost all the major investment in infrastructure and employment will be in Hemel and very little in Tring or Berkhamsted. This is not equitable and definitely not balanced.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3516
<b>Person ID</b>	1263824
<b>Full Name</b>	Nichola Criddle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><i>You state as a key principle:  "Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations".</i></p> <p><i>Comment:  Your proposals fail to deliver balance in that Tring will be expected to accomodate a growth in housing of over 50% - way in excess of that in Hemel Hempstead. It would also appear that almost all the major investment in infrastructure and employment will be in Hemel and very little in Tring or Berkhamsted. This is not equitable and definitely not balanced.</i></p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3529

<b>Person ID</b>	1263821
<b>Full Name</b>	Anne Isherwood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3566
<b>Person ID</b>	1145631
<b>Full Name</b>	Mr Alastair Greene
<b>Organisation Details</b>	Clerk Little Gaddesden Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Whilst there remains doubt about the potential growth in the Hertfordshire area (Brexit impact, change of work patterns, immigration level changes) I think that c 700 homes pa c. 11,000 over the plan period would be sufficient and would avoid to some extent the pressure for greenfield development.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS3594
<b>Person ID</b>	1263865
<b>Full Name</b>	Robin McMorran
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	NO! This is desecration of the precious green belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3607
<b>Person ID</b>	369415
<b>Full Name</b>	Mr Dacorum EnvironmentalForum
<b>Organisation Details</b>	Chair Dacorum Environmental Forum Waste Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	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.  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** Spatial Strategy for Growth

**ID** EGS3631

**Person ID** 1263885

**Full Name** Mr Neil Roberts

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3661
<b>Person ID</b>	1263887

<b>Full Name</b>	Atherton Powell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The number of houses propped for Tring alone is way out of proportion with other areas. Instead the council should focus on brownfield or urban sites that need development.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3682
<b>Person ID</b>	1263016
<b>Full Name</b>	Joanna Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The Housing Growth numbers in the Plan is based on flawed assumptions, Para 5.3 – 5.5 [P30]</p> <p>The proposed housing sites are not Urban land as you say you intend to develop, rather they are Green Belt corridors. 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. They are not near any passenger transport or other services, facilities or employment opportunities.</p> <p><b>SP2 3B</b> Berkhamsted will accommodate growth of 2,200 new homes.</p> <p>The Adopted Core Strategy (2013-2036) para 6.2.8 identified capacity (not “<b>need</b>”) in Berkhamsted of 600. Only eight years later this statement indicates that Berkhamsted will have an additional 1600 homes imposed upon it.</p>

The Town Centre already suffers from congestion and suspect air quality, viz data for Lower Kings Road shows the level of NO2 in some periods exceed the 40micrograms/cm3 limit, albeit that the annual record does not show exceedances. In many respects at its current size and topography the Town has reached the limits of capacity as evidenced by traffic congestion, shortage of school places at primary and secondary levels, GP and associated services, sports facilities and in-town open space. I do not agree that the substantial increase imposed on the Town will enhance the quality of life for residents current or future.

Basically there isn't enough disposable space to build this number of houses.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3686
<b>Person ID</b>	1263488
<b>Full Name</b>	Ms Pauline Frankel
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am emailing you to express my objection to the proposed development outlined in Dacorum Borough Council's document entitled "Emerging Strategy for Growth (2020 – 2038)".</p> <p>The following are my principal objections to developing pristine land which will be lost forever:</p> <p>1 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.</p> <p>2 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.</p> <p>In addition, I also object on the grounds of failure to consider climate concerns, traffic congestion, increased health, education, water and sewerage requirements and the use of brownfield sites.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3693
<b>Person ID</b>	1263908
<b>Full Name</b>	Thomas Burger
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	Outdated
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3709
<b>Person ID</b>	1263921
<b>Full Name</b>	sarah diehl
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3750
<b>Person ID</b>	1263939
<b>Full Name</b>	Mr Richard Dawkins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Paragraph 5.3 of the “spatial Strategy for Growth” (Footnote 5.p30: Draft Local Plan) states “we know we cannot accommodate all the growth within the urban area, so [...] we do need to release land from the Green Belt”. Also Policy SP2 – Spatial Strategy for Growth (Footnote 6.P 31-32: Draft Local Plan) provides very specific targets for the numbers of dwellings to be built between 2020 and 2038. However, these targets are now highly likely to be too high and the level of land to be released from the Green Belt may no longer be necessary.</p> <p>After the Draft Local Plan went out to consultation on 27th November 2020, the Government announced (Footnote 7. <a href="https://www.gov.uk/government/news/plan-to-regenerate-england-s-cities-with-new-homes">https://www.gov.uk/government/news/plan-to-regenerate-england-s-cities-with-new-homes</a> ) 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 8 <a href="https://www.housingtoday.co.uk/news/jenrick-launches-revised-housing-numbers-algorithm/5109565.article">https://www.housingtoday.co.uk/news/jenrick-launches-revised-housing-numbers-algorithm/5109565.article</a> ).</p> <p>Given that 5,945 (35%) of the 16,899 dwellings earmarked in the Draft Local Plan (Footnote 9. 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 10. NPPF Para 137, p41) states that a strategic policy-making authority needs to “demonstrate that it has examined fully all other reasonable options for meeting it’s identified need for development” before it concludes “that exceptional circumstances exist to justify changes to Green Belt boundaries”. Preparation of a Local Plan 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 11. Plans are only ‘sound’ if they are b) “justified – an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence”)).</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 under review as we progress to the next stage of the Plan and make any necessary adjustments when we know more” (Footnote 12. Paragraph 7.5 p35: Draft Local Plan)

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.

The updated Draft Local Plan would therefore need to amend Policy SP2 and potentially Policy SP3 (Footnote 13 p33: Draft Local Plan.) should “significant development” in Berkhamsted be no longer required to meet the updated housing target. Pages 35-40 would inevitably need amendment.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3784

**Person ID** 1263924

**Full Name** Susan Moore

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I do believe that tackling environmental issues, regeneration and well being are at the heart of any arguments against concentrated building plans in Hertfordshire.

We need to think of the consequences of such schemes on our resources such as water, green space for nature to flourish and air quality.

Lockdown has taught the working generation that proximity to London is no longer a requirement now that the success of working from home or a local hub is established.

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.

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.

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.

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** Spatial Strategy for Growth

**ID** EGS3793

**Person ID** 497160

**Full Name** Mrs B\_R Agar

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

With regard to the number of new homes envisaged for Berkhamsted and Dacorum, I feel strongly that the infrastructure will not be appropriate.

I understand that Watford Hospital is only going to be refurbished WITH NO MORE BEDS. How can they accommodate the possible 40,000 to 60,000 more people from the 16,600 new homes, just in Dacorum - you can't get a quart into a pint pot! It has been very difficult to get doctor's appointments in Berkhamsted, even before the virus.

Parking and traffic in Berkhamsted will become even more of a problem with all the new houses, as they will want to access the supermarkets, doctors, schools etc. and Berkhamsted has very narrow roads. Trains have always been crowded, as well as the car park at the station, so that will also present problems. As well as the lack of sufficient infrastructure, we will also ruin the nature of historic old towns like Berkhamsted.

The Government should be levelling up and encouraging businesses to move North, which I believe they have already started with some Government Departments. During the virus, more people have found that they can live further away from where they work.

Please rethink your plan and don't ruin lovely old towns like Berkhamsted and put people in danger and inconvenience from lack of sufficient infrastructure.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3800

**Person ID** 334444

**Full Name** Mrs Alison Westwood

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** I am writing to let you know I disagree with the Local Plan and the housing numbers proposed. I shall be using the consultation portal, but I would also like my response noted here.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3805

**Person ID** 1263468

<b>Full Name</b>	Bruce Day
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	SP2 states that "Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel Hempstead in providing more balance to the growth focus .....". This so-called balance is sure to be both costly and difficult and does not sit well with sustainability objectives/requirements for the character of those market towns.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3826
<b>Person ID</b>	1262291
<b>Full Name</b>	Paula Farnham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>On many levels I believe it fails the residents of Dacorum.</p> <p>The stated housing target is I understand higher than required. The idea of sustainable development in context of the plan is at odds with a sustainable way of life. All services will be stretched to the point life will be more polluted, congested and lack community.</p> <p>The attractiveness for business is based on access to the motorways but this doesn't deliver well paid long term jobs, just more delivery centres.</p>

A more cohesive and strategic plan is needed to account for a large retail area that's in many ways unattractive being of lesser value.  
All round more work required for a credible plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3851

**Person ID** 1263982

**Full Name** Lisa York

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS3881

**Person ID** 1144948

**Full Name** Mr Peter Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Spatial Strategy for Growth comment</b>	There is little actual evidence of 'well-established principles of sustainable development'. There is no provable case for supporting retail development when 'live' shopping is in dramatic decline. Asking that Berkhamsted plays a greater role in delivering growth when the town is already exceeding current targets is a complete dereliction of the council's duty of fairness.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3886
<b>Person ID</b>	1263996
<b>Full Name</b>	Gary and Rosemary Bottrill
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	With regards to the Local Plan above whilst we appreciate a level of development is inevitable the scale of the proposed numbers are excessive and will have a detrimental affect on the landscape.  Additionally the impact from the developments on pollution, local services, ecology do not seem to have been fully made clear in the proposals.  We are against the Plan in its current format.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3894
<b>Person ID</b>	1264002
<b>Full Name</b>	Christopher Woods
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I WISH TO OPJECT TO DACORUM USING GREEN BELT FOR DEVELOPMENT1 GREEN BELT SHOULD NOT BE BUILT ON! GREEN BELT IS THERE FOR A REASON LET IT REMAIN THAT WAY. ONCE IT IS GONE IT WILL NEVER COME BACK, NATURE IS VERY INPORTANT TO OUR WELL BEING. DACORUM SHOULD REALISE AFTER THE LOCKDOWNS THAT THE GREEN SPACE IS NEEDED.  THERE ARE PLENTY OF OTHER SITES THAT CAN BE USED.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3900
<b>Person ID</b>	1264006
<b>Full Name</b>	Mrs Anmarie Townsend
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	This plan looks to squeeze a large number of people into a relatively small space with little regard to infrastructure, health and environmental well being. One example being the over building in and around Apsley which is already highly congested and will be more so with all the proposed new builds. Also many of these proposals are for high rise apartments totally out of keeping with the traditional environment.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3925
<b>Person ID</b>	1264025
<b>Full Name</b>	Caroline Sherwen

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt. The sheer number of houses is excessive, will change the very nature and feel of the town and destroy precious green space. This is not the time to be destroying such a precious resource.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3927
<b>Person ID</b>	1263988
<b>Full Name</b>	Andrew Grout
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	This is totally flawed , Berkhamsted is far larger than Tring yet Tring gets more houses .
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS3961

Person ID	1263426
Full Name	Marilyn Whyman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Spatial Strategy for Growth comment	<p>This answer is in respect of <b>GROWTH AREA KL02 LAND AT RECTORY FARM</b>, (I am unsure if I am commenting in the correct area!)</p> <p><b>Firstly I would like to say how confusing this document is and I fear a number of people will be put off commenting on these proposals!</b></p> <p>I totally object to the proposed development on the Green Belt land at Rectory Farm.</p> <p>Kings Langley is an historic village but sadly due to over development is seriously losing its identity as a 'village'.</p> <p>Parking has become a nightmare. Traffic, congestion and pollution is equally bad.</p> <p>Kings Langley roads cannot take any more traffic. There are constant traffic delays on the Hempstead Road as we are near the junction of the M25, often the traffic is at a standstill, it is unacceptable now without adding further traffic.</p> <p>If these 200 houses are built on RECTORY FARM the village will just merge with Apsley and Hemel. We will have little green space around, we will have a totally built up area. One of the reasons Green Belt land was put in place is to prevent this from happening....we will become one big sprawling area of mass development. Also one of Green Belt lands main purpose was 'to preserve the setting and special character of historic towns" Kings Langley is an historic settlement incorporating a site of a Royal Palace, a 12th century church and a 13th century Priory.</p> <p>RECTORY FARM has been neglected for a long time as it was owned privately. The original owners moved away from Kings Langley and sadly part of the land has become unkempt but it is STILL Green Belt land. and could flourish once again with the right attention. When I first moved to Kings Langley some 40 years ago, Rectory Farm was a thriving business with communities getting together fruit picking, it was a place that everyone loved and many people from outside the village brought their families to pick the fruit and vegetables. It was a safe place for families to get together and away from the built up areas. This Green Belt land was invaluable. Should we not be considering using this area again for the community? We should be providing a place where people can come and unwind, relax and enjoy the open space and fresh air. We would have a place where the fragile wildlife would flourish and recover.</p> <p>Once this Green belt land has gone, it has gone forever. What are we doing? Is it not important that we keep open space to enjoy and cherish for our future generations?</p>

Have we not learned anything from the recent issues regarding climate change with flooding and droughts...It is imperative that we should hold onto our Green belt land. Covid has made us realise we need more open space to enjoy and we should NOT be reducing the very little open space we have.

It is an embarrassing fact that the UK only have 13% of woodland, we are the least wooded country in Europe, who have a minimum of 35%

Our Government in celebration of the National Tree week committed to new funding to help reach its tree planting commitment....and yet here we are bulding on Green belt land....it does not add up. They are planting more trees by water and rivers to help to stop flooding, why are we bulding 200 houses next to a river....it is bound to become a flood risk area. A prime example is what has happened across the canal where Three Rivers gave the go agead for new houses to be built. When we had heavy rainfall a few weeks ago the road outside the new development was totally under water, like a river! I do have a photo which i hopefully will be able to submit.

Lastly, what about the impact on wildlife? I have asked several times who was responsible for carrying out the ecology survey?, todote I have had no response.

It is a fact that there is a family of 6 Roe Deer living on Rectory Farm ( I have video footage). There are definitely bats in the sheds which have been seen flying in and out.

Why do we allow these Property Developers to come in, build a development and leave without caring about the consequences of what they leave behind. All they care about is profit. In todays world we should care more about what is important....and that is definitely enjoying our Green Belt land and open spaces.

PLEASE reconsider buliding this development on Green Belt land.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4029

**Person ID** 1258646

**Full Name** Jane Timmis

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

Yes / No * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The housing 'requirement' is a Government imposed number which is not evidence based; they are using data from 2014, in fact the current evidence base of housing need is at least 40% less than the 922 quoted in the Local Plan.</p> <p>There is no evidence of Dacorum Borough <b>needing approximately 17,000 houses</b> building over the next 18 years.</p> <p>As a result over 2,000 acres of Green Belt and green field in the Borough are being sacrificed, despite the fact that the Housing Secretary has said that building homes should <b>not come at the expense of harming our green spaces</b>; the NPPF states that the Green Belt should be protected and only used in <b>exceptional circumstances</b>. So why does the Council continue to pursue this sacrifice of Green belt?</p> <p>No mention of protection zones in the Plan.</p> <p>There is a need for a much reduced number of houses and new genuinely affordable houses.</p> <p>There are only descriptions of employment opportunities in Hemel Hempstead with the expansion of the Industrial area.</p> <p>The 'roles' that Berkhamsted and Tring are 'expected' to play are excessive and unnecessary; and without room for the needed infrastructure.</p> <p>Infrastructure has not been specified in the plan and yet it is crucial to the delivery of any development.</p> <p>More comments about development in Markyate can be found in the section on Settlement Hierarchy.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4033
<b>Person ID</b>	1264064
<b>Full Name</b>	Melanie Ingram
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes

## Spatial Strategy for Growth comment

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form.

Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms.

**The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.**

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

The Council has failed to provide any evidence to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to explore the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The council's inner settlement plans and their assessment of housing needs is yet to demonstrate any consideration of the implications of these factors.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4051

**Person ID** 1250022

**Full Name** Mr Michael Ridley

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4058

**Person ID** 1262892

**Full Name** Jean Farrer

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>Spatial Strategy for Growth comment</b>	I fully support the submissions of the One Voice alliance on these issues.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4085
<b>Person ID</b>	1264201
<b>Full Name</b>	Philip Hughes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	5.4 The expansion of Hemel Hempstead proposed is way too much. There is no justification to remove land from the Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4087
<b>Person ID</b>	1264210
<b>Full Name</b>	Fiona Fulford
<b>Organisation Details</b>	myself
<b>Agent ID</b>	1264200
<b>Agent Name</b>	Fiona Fulford
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Spatial Strategy for Growth comment</b>	<p>The projected requirement for the number of new homes is double the level it should be within the borough (and government will take advantage of this overprojection compared with other 'commuter regions'). The projections should be based on 2018 ONS numbers rather than 2014 numbers which would approximately halve the projections across the borough to a more realistic 351-536 built annually across the area.</p> <p>In addition, while I appreciate that Hemel Hempstead is taking the bulk of the development it cannot really be compared with Berkhamsted and Tring. Hemel is a far more modern conurbation around the M25/ M1/ A41 intersections. Being more modern it has wider main roads to take the additional traffic that will result from the additional housing. By contrast, Berkhamsted and Tring are old market towns which are already gridlocked at busy times. With the additional proposed housing being on green belt rather than brown field sites and therefore away from the centres of the towns will stimulate more car use and exacerbate the problem further.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4107
<b>Person ID</b>	742793
<b>Full Name</b>	Mr Lawrence Sutton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>In section 5.1 “To establish a framework for growth we have identified a strategy which has been guided by a number of considerations, stemming from well-established principles of sustainable development together with a number of local considerations.” It is not sustainable to build houses on Green belt land, you are just creating more urban sprawl. No local consideration is taken into account of Berkhamsted in the development plan, the land being developed is far from the centre of the town and large parts are on the top of steep hill side sites. This will only create negative environmental impact on the town.</p> <p>In section 5.2 “Delivering our economic aspirations by providing employment opportunities as well as supporting retail development;” Berkhamsted only has limited employment opportunities and building many new homes will not enhance</p>

the opportunities. Realistically people would drive to the station in town and work in London or drive to neighbouring larger towns for work.

In section 5.2 “Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites;” The only justification given for building on Green Belt land is meeting a target set for development by the government that should be challenged and are not realistic for Dacorum. The strategy admits to having an impact on an area of AONB that is protected. It will be a blighted AONB if this development on **protected** land takes place. Future generations will rightly judge us harshly for the environmental damage and impact that building on Green belt land would create.

In section 5.3 ‘The spatial strategy aims to deliver the significant uplift in growth in a sustainable way across the Borough...We know that we cannot accommodate all the growth within the urban area, so despite our approach to increasing densities and heights, we do need to release land in the Green Belt.’ It is not sustainable to release and build on Green Belt that provides green open space in urban areas. Dacorum does not need to accommodate growth figures that are not set in stone by the government and need to be robustly challenged.

In section **5.5** “The Growth Strategy for Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.” Building on the remaining open spaces and Green Belt in Berkhamsted is an ‘urban intensification strategy’ that will **definitely** detract from the town. This is doesnt ‘manages landscape and Green belt impact’ it is simply maximising the impact on the town. The new proposed developments in Berkhamsted are **not** sustainably close to passenger transport or the town’s facilities. They will necessitate a large increase in unsustainable car journeys.

#### In “**Policy SP2 - Spatial Strategy for Growth**”

Section 3. b. “Berkhamsted will accommodate growth of at least 2,200 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.”

Building at least 2,200 new homes in Berkhamsted on the outskirts of the town will not enhance the town centre. The town centre is already grid locked with cars during busy periods and building this many houses on the edges of the town will only intensify this situation. Transport in the town will **not** be sustainable and people will not cycle because of the steep hills on which most development will take place. The new homes will be removing significant open spaces from the town and once they are built on you can not get them back.

#### Included files

**Title** Spatial Strategy for Growth

**ID** EGS4117

**Person ID** 1264070

<b>Full Name</b>	Michelle Carnegie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	DBC has taken numbers from government as a strict target which has led to a growth strategy at an unsustainable location taking up swathes of greenbelt land.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4174
<b>Person ID</b>	1145844
<b>Full Name</b>	Dr and Mrs Melvyn Else
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The housing growth targets for Berkhamsted and Tring will see significant areas of green Belt Land destroyed. The council needs to ensure that if these numbers are to be met they have fully utilised existing available sites particularly those with good transport links and access to a wide range of facilities.</p> <p>To minimise car usage the large increase in houses in Berkhamsted and Tring should be accompanied by an increase in places of work sites be they industrial, office based or other. The plan appears to have a great mis-match of houses planned and planning for local working opportunities in Berkhamsted and Tring. Indeed office and industrial sites are being given up for housing. Additional retail floorspace point 1d in towns may be a thing of the post in a post Covid world.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4176
<b>Person ID</b>	1264269
<b>Full Name</b>	Paul de Hoest
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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. <b>I agree with the stance taken by all of these groups.</b> 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>Aside from being instructed by the Government to build 17,000 new homes what is the obsession with growth? Nature does not work this way, plants, trees, animals and people grow to maturity to a size that evolution has deemed optimal and they stop growing. They Why is it that we think that "growth" is a sensible target at all. Berkhamsted and Tring have already been stretched beyond sensible limits given the historic fabric and culture of these towns. Why compound this even further? I aspire to an enriched social economy not a bigger economy.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4191
<b>Person ID</b>	1264301
<b>Full Name</b>	James Stringer
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach</p>

was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4204

**Person ID** 1264306

**Full Name** Peter Williams

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Buckinghamshire Council welcomes the draft plan's overall approach of meeting Borough's development needs within its own boundary as set out in policies SP2 and SP4. However, it is noted that the plan only contains a small buffer of 300 homes and a high amount of windfall. This risks the need for more housing sites to be allocated or the transfer of unmet need to other areas if suitable sites cannot be located in the Borough. This risk is heightened by the likely increase in housing need revealed in a recent Duty to Cooperate meeting between the two councils. Buckinghamshire Council therefore urges Dacorum Council to continue its approach of meeting its need within its borders as securing unmet housing need in the Buckinghamshire Council area would be challenging given the high level of commitments and allocations around Aylesbury, and the significant level of housing need that will need to be accommodated in the forthcoming Buckinghamshire Local Plan.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS4238
<b>Person ID</b>	1264320
<b>Full Name</b>	JACKIE GLOSSOP
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4253

**Person ID** 1261915

**Full Name** Eleanor Lovett

**Organisation Details** Landhold Capital

**Agent ID** 1261754

**Agent Name** Eleanor Lovett

**Agent Organisation**

**Yes / No** Yes

- \* Yes
- \* No

**Spatial Strategy for Growth comment**

Paragraph 5.2 establishes that key principles behind the strategy include matters such as delivering the requirement to significantly boost housing. However, Landhold Capital is concerned that some of these key principles appear contradictory, in particular seeking to minimise and manage the requirement for development on Green Belt. Given the significant constraint posed by the Green Belt in the Borough and the proposed release of substantial areas of Green Belt through this Plan, it is considered that this principle is not appropriately worded. Furthermore, Landhold Capital considers that the Council has not established an appropriate housing requirement through this draft Plan, and it is suggested that in order to meet the Borough’s actual housing requirement as a minimum, in a sustainable way, will involve the release of further Green Belt at settlements such as Kings Langley. This approach would be supported by Paragraph 138 of the Framework, which specifically states that where it has been concluded that it is necessary to release Green Belt land for development, first consideration should be given to “*land which has been previously developed and/or is well served by public transport*” [emphasis added]. Kings Langley, whilst only a large village in terms of the settlement hierarchy, benefits from an existing train station which Landhold Capital considers should result in further release of Green Belt and allocation for housing through this Plan.

This Chapter goes on to consider the Spatial Strategy through Policy SP2, which confirms that the Local Plan will make provision for ‘*a minimum of 16,596 homes*’. Landhold Capital considers that this requirement is inadequate and does not properly reflect the housing requirement for the Borough.

The South West Hertfordshire Local Housing Needs Assessment (LHNA) published in 2020 established that the housing requirement for the Borough is 1,023 homes per annum, a figure that is based on the Government’s standard methodology. Whilst it is accepted that at the time the Council were finalising this version of the Plan there was some uncertainty regarding the exact housing requirement due to a consultation held on amending the calculation for the standard methodology, with the draft figures resulting from the amended calculation reducing the Council’s housing requirement to 922 dwellings per annum. The Housing Topic Paper confirms that the Council considered it appropriate to use the draft figure rather than the current standard method figure for the purposes of this Plan.

However it is considered that the Council should not have based this version of the Plan on those draft figures, as there was uncertainty regarding the figures provided by the revised calculations and the implications of that for achieving the Government’s objective of boosting housing delivery. Furthermore, given the uncertainty at the time, it is arguable that the Council should have used the higher figure as in any event, the housing requirement represented a minimum figure that the Plan should seek to deliver, and in reality it should be planning to exceed this in order to boost housing delivery as required by paragraph 59 of the Framework.

In any event, the Government subsequently confirmed that the calculation for the standard method reverts to the 2018 methodology, with only minor revisions that would not affect Dacorum’s requirement. Although this was not confirmed until after the start of this current consultation, the implications of it are significant and this could have been avoided if the Council had used the original figure rather than the draft figure proposed at the time. Planning for a higher figure would have also ensured accordance with the Framework, which requires authorities to plan for objectively assessed needs as a minimum, and support the Government’s objectives of significantly boosting the supply of homes.

The implication of an increased housing requirement for Policy SP2 is that the Borough will need to deliver more housing than is currently proposed, which in any event should be considered as a minimum figure that ought to be delivered during the plan period. As a result, it is considered that the Council should review its proposed Spatial Strategy as set out in Policy SP2, and particularly the role that the larger villages will play in this Plan. The strategy as currently proposed seeks to deliver only minimal growth at these three settlements, despite the supporting text at Paragraph 5.6 recognising that the three settlements provide a reasonable level of services and facilities but cites constraints in regard to infrastructure which appears to justify proposing '*only modest levels of growth*'.

In order to meet a higher housing requirement, it is considered that further development opportunities should be explored at these settlements, in particular Kings Langley, as development could help to secure additional and/or improved infrastructure as set out in the Council's Vision for the Plan. The Council had previously considered the allocation of additional sites at Kings Langley in the preceding draft version of the Plan, consulted on in 2017. That version of the Plan considered the allocation of three sites at Kings Langley, including land to the west of the village that demonstrates that growth to the west was considered acceptable and would be appropriate for release from the Green Belt. Kings Langley is considered to represent a highly sustainable location, with the potential for growth to the west that is not constrained environmentally and should therefore feature in the emerging Local Plan in order to ensure that a sound strategy is proposed that will help the Council to significantly boost housing delivery in a sustainable manner.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4272

**Person ID** 1264321

**Full Name** David` Fox

**Organisation Details** personal

**Agent ID** 1264318

**Agent Name** David  
Fox

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

We need more housing. However, the projected requirement for the number of new homes is double the level it should be within the Borough (and government will take advantage of this over-projection compared with other 'commuter regions'). The projections should be based on 2018 ONS numbers rather than 2014 numbers which would approximately halve the projected requirement across the Borough to a more realistic 351-536 built annually.

In addition, while I appreciate that Hemel Hempstead is taking the bulk of the development it cannot really be compared with Berkhamsted and Tring. Hemel is a far more modern conurbation around the M25/ M1/ A41 intersections. Being more modern it has wider main roads to take the additional traffic that will result from the additional housing. By contrast, Berkhamsted and Tring are old market towns which are already grid-locked at busy times. With the additional proposed housing being on green belt rather than brown field sites and therefore away from the centres of the towns will stimulate even more car use and exacerbate the problem further.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4301

**Person ID** 1264325

**Full Name** Olivia Halper

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment** There should be mention of growth within St Albans to the east of the town and cross-boundary working to deliver HGC growth in a joined-up way here.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4320

**Person ID** 1261265

**Full Name** Richard Case

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Spatial Strategy for Growth comment</b>	<b>Too much housing and not enough of it as truly affordable rentable or rent to buy housing</b> The population growth targets set out in the DLP will dramatically change the character of the area. This is particularly the case for the market towns and large villages. These targets do not seem related to recent developments regarding national population growth and distribution. Nor do they seem to recognise the role of the Government's "levelling up" agenda in increasing demand in the North rather the South of England. From experience of what has actually been built in the last ten years we are doubtful whether enough affordable housing will be built and whether there will be enough rentable housing provided by Housing Associations or the Council.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4355
<b>Person ID</b>	1264342
<b>Full Name</b>	Ms Hilary Lawson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	As a Dacorum resident, I am extremely concerned that the plan imposes massive over-development on our local environment, with irreversible loss of hundreds of 850 hectares of Green Belt land, countryside and urban green spaces. I have outlined my principal objections below:  Flawed data for housing requirement: The Local plan uses 2014 ONS data to calculate housing provision, leading to a 24% increase in housing proposed in Berkhamsted and a 50% increase proposed in Tring. However the 2018 ONS data is both more up to date and indicates a housing requirement that is around half of what is outlined in the plan. These proposed housing numbers must be challenged.  Over-development of greenbelt land, the Chilterns Beechwoods Special Area of Conservation and the Chilterns AONB: Almost all of the proposed development is on Greenbelt land, which is against government policy. Once green belt land

is released for housing, even if the housing requirement is revised down in future, it will be very difficult for the Council to prevent developers building on it.

Potential for brownfield site development: More work needs to be done to identify brownfield sites that could be adapted in the wake of a rapid and seismic shift in working and shopping patterns. The COVID pandemic has dramatically accelerated the trend away from high street retail and office-based working. In the wake of both COVID and Brexit, the government has allowed commercial and office space to be converted to residential. However, the current plan includes a requirement to increase the amount of office space in the borough, based on projections that have been overtaken by the impact of the pandemic. It is vital that the local plan does not proceed based on projections that are already outdated. The potential for delivering housing requirement via converting commercial and office space has not been fully explored in this proposal.

Impact on infrastructure: For Berkhamsted, the plan does not address the impact of such a significant amount of new housing on traffic congestion, education or healthcare provision. There are no significant proposals for improvements to roads or traffic flow, already under significant pressure. There are no significant improvements to public open spaces, particularly when such a large area of existing open space is to be removed. There is no indication of if/how bus routes may be provided. Given the valley setting and the distance of some of the sites from the town centre facilities, a major increase in traffic is inevitable with all the concomitant issues of air pollution, longer journey times and less appeal for cyclists and other road users.

Increase in air and noise pollution: When the A41 bypass was built, the buffer between the road and housing in Berkhamsted was intended to be a 'green lung', absorbing traffic noise and pollution. A large proportion of the proposed housing development is planned on this land.

I urge you to reconsider the proposal, invest in new studies that assess the impact of COVID-19 and Brexit on the borough's requirements, and put out a new consultation based on what Dacorum's community will actually need in the future, rather than on earlier projections that could not have taken into account the dramatic effect of the last 12 months on how we live, shop and work.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4362
<b>Person ID</b>	1262873
<b>Full Name</b>	Donna Atkinson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	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, 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.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4373
<b>Person ID</b>	1264326
<b>Full Name</b>	Deborah Sinclair-Day
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	SP2. 3 d) Markyate: 215 homes is not "modest expansion" for a village that has already had two recent housing developments of 40 and 79 homes.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4412
<b>Person ID</b>	1264062
<b>Full Name</b>	James Metcalfe
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am unhappy with the amount of green belt land being built on.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4444
<b>Person ID</b>	1264316
<b>Full Name</b>	Melanie Turner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.  Will we have an opportunity to comment on the sang to Natural England?
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4485
<b>Person ID</b>	1264363
<b>Full Name</b>	Roselyn King

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>As a result of covid-19, there is likely to be a reduction in demand for retail floorspace. There may also be a reduction in demand for office floorspace. Hopefully this will mean you can build more housing on brownfield land and consequently reduce your plans to build on the countryside.</p> <p>As regards Hemel, the town centre area is currently very spread out, going all the way from the Old Town to the Riverside development. I would like it if any shops/businesses/takeaways etc that retain their presence in the town centre post-covid could be consolidated into a much smaller area (eg the Marlowes centre) with most of the current town centre being redeveloped for housing. I think it would also make sense for the "Leisure World" cinemas, restaurants etc at Jarman Park to move to the town centre and you could then build housing on Jarman Park.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4487
<b>Person ID</b>	1264395
<b>Full Name</b>	R Jane Dickson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The target for new housing in Dacorum on which the Spatial Strategy is based is far too high and out of line with more up-to-date figures.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4495
<b>Person ID</b>	1264403
<b>Full Name</b>	Jake Latham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I would like to voice my oppositions and concerns on the current 'Emerging Strategy for Growth 2020-2038'. This is based on a number of objections that will have a personal impact on my family, me and my community.</p> <p><b>Destroying the feel and way of life for my local community</b></p> <p>Community is something that I feel very strongly about and something that Tring and Berkhamsted currently oozes. Recent mass developments in both Aylesbury and Hemel Hempstead is already threatening to swallow up both Tring and Berkhamsted market towns in to mass suburbia.</p> <p>The proposed growth strategy with completely change the community feel of these market towns, that I want my family to grow up in.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4518
<b>Person ID</b>	1261836
<b>Full Name</b>	Richard Sutton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<p>Yes / No * Yes * No</p>	<p>Yes</p>
<p><b>Spatial Strategy for Growth comment</b></p>	<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"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.).</li> <li>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.</li> </ol> <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> <p><b><u>Incorrect Assumptions for Housing Provision</u></b></p> <p>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.</p>

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**

<b>Title</b>	Spatial Strategy for Growth
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<b>ID</b>	EGS4569
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<b>Person ID</b>	1145918
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<b>Full Name</b>	Mr Richard Tregoning
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#### **Organisation Details**

<b>Agent ID</b>	
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<b>Agent Name</b>	
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<b>Agent Organisation</b>	
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<b>Yes / No</b>	Yes
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<b>* Yes</b>	
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<b>* No</b>	
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<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4596
<b>Person ID</b>	1264453
<b>Full Name</b>	Fiona Hinton
<b>Organisation Details</b>	Myself
<b>Agent ID</b>	1264426
<b>Agent Name</b>	Fiona Hinton
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The numbers given but he Government should not be interpreted as a target. This misinterpretation has led to an unsustainable strategy that will cost huge amounts of Green Belt land.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4604
<b>Person ID</b>	1263004
<b>Full Name</b>	Jill Townsend
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>Why is it a 'given' that Green Belt land is available to be taken in this way? Talk of <b>minimising the impact</b> on Chilterns AONB and other protected sites is dangerous. What next? Build on the site of the remains of Berkhamsted Castle or areas of Ashridge? This is a travesty and councillors prepared to vote in favour of allowing this should be ashamed of themselves.</p> <p>Talk of regenerating the town centre of HH ignores the impact of the pandemic on high streets across the country. The growth of online purchasing should not be underestimated. John Lewis closing it's Watford shop is a sign of the times to come.</p> <p>The plan talks about regenerating HH as an employment hub. Yet it completely ignores the fact that Berkhamsted and Tring are commuter towns for LONDON! But for the train links to London, the towns would not be the prosperous towns they are now. People will not want to move to these towns without being able to enjoy the beautiful surrounding countryside and views.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4618
<b>Person ID</b>	1264462
<b>Full Name</b>	Penny Clifton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>This plan proposes that 64% of the new homes will be on green belt land (77% on green field sites). Berkhamsted seems to bear the brunt of this approach with 80% of homes on new green belt sites.</p> <p>It appears that Dacorum BC has incorrectly used housing numbers from the Government's Standard Methodology as a target for housing, despite the fact that the government themselves have said this is not to be taken as a target.</p>

As a result, this plan is based on a false premise: it uses incorrect numbers, with an inaccurate growth strategy at unsustainable locations and thus at the cost of huge swathes of green belt land.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4627

**Person ID** 1264477

**Full Name** Vivianne Child

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Where is the understanding within the plan that the location of Tring is adjacent to the Buckinghamshire border and the large and expanding town of Aylesbury. The developments over the border are important in the context of the Dacorum local plan, especially the large provision of warehousing and employment opportunities provided by the Aylesbury expansion. This is expanded upon within the Tring in Transition response.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4628

**Person ID** 1264481

**Full Name** KEITH AND LEAH RYDING / BREZOVEC-RYDING

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>Spatial Strategy for Growth comment</b>	<b>Over development.</b> Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. Clearly the Berkhamsted development is not aligned to the current strategy.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4643
<b>Person ID</b>	1264486
<b>Full Name</b>	JIM JEFFERSON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Finally, I would ask that the Local Plan Consultation be halted and that the plan is redrawn with all needs and targets based on current, up to date estimates.  Green Belt Land should not be considered for use until all other avenues have been exhausted and a critical need established beyond doubt.  Dacorum has a lot to offer both local residents and visitors without dramatically changing the character of our historic local towns, something that this plan, in its present state will do.  I ask you to reconsider your strategy taking in the wishes of the local communities who have already voiced their opposition to the plan.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4647
<b>Person ID</b>	1148944

<b>Full Name</b>	Carol Atkinson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>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.</p> <p>Given the Climate Emergency, existing huge pressures on infrastructure and serious problems with loneliness and mental health, I am dismayed that you are intending to increase the number of planned houses so much with no provision whatsoever to build community and enable easy access to essential services - shops, schools, public transport, parks, community centres etc. I am also horrified that with nature really struggling to survive the pressure our population puts on it, you are planning to build homes on green space and green belt. Instead you should be improving the biodiversity of that land and stopping fly tipping and the public damaging the edges of woodland and fields by parking on them.</p> <p>Without proper plans for provision of infrastructure, businesses and retention of green space your proposals will accelerate climate change and create areas of deprivation, crime and isolation. We have more than enough of them in Dacorum already. Particularly in Hemel.</p> <p>Communities need good access to local shops, excellent schools, quality jobs with a variety of business types, attractive parks and green spaces, theatres, cinemas, places of worship, Pubs, restaurants, cafes, places to dance sing and meet up. They barely feature in your plans.</p> <p>Climate change and BREXIT have shown us how vulnerable our food supplies are to drought, flood, trade issues and loss of biodiversity - pollinators in particular. We need to ensure people have access healthy, sustainable, locally grown food - why not use parts of redundant large shops and shopping centres for growing food hydroponically?</p> <p>Please think again and at the very least extend the consultation.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS4672
<b>Person ID</b>	1145431
<b>Full Name</b>	mr David van Rhee
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p> <p>intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set</p>

out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4685
<b>Person ID</b>	1143273
<b>Full Name</b>	Mr Mark Rogers
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<p><b>Yes / No</b> * <b>Yes</b> * <b>No</b></p>	<p>Yes</p>
<p><b>Spatial Strategy for Growth comment</b></p>	<p>I totally disagree with the planned expansion of homes in the Green Belt in Dacorum. There are NO EXCEPTIONAL circumstances strong enough to support these special areas. The use of green belt land on the outskirts of Kings Langley village at Rectory Farm is totally unnecessary. The DBC brownfield register contains NO SITES in Kings Langley whilst residents know there are plenty that may be repurposed including garage sites, telephone exchange(with less than 5% of the building being used, only the car park is fully utilised). In pursuit of environmental concerns it is essential to minimise the destruction of wildlife habitats.</p> <p>The Rectory Farm land separating Kings Langley from Apsley fulfills a key tenant of Green Belt policy reducing coalescence between communities. It acts as a check to the sprawl of the already over built up areas along the canal. This land should be used to help protect wildlife of all types that live nearby by creating a wildlife corridor along the canal and River Gade.</p> <p>"Providing growth in the villages that reflects their role and character;" - Kings Langley is a village that has seen growth for many years but infrastructure is woefully below what is needed particularly related to road provision. Finding and securing sites brownfield should be the #1 focus. The greenfield areas like Wayside Farm, should stay green as it is part of the character of the village and the green areas prevent KL from becoming one large conurbation with Apsley to the north and Hunton Bridge/Watford in the south.</p> <p>I am very concerned that we are being asked to comment on Dacorum's local plan without sight of the Three Rivers District and the St Albans plan. Both of which will impact Kings Langley disastrously as the draft plans contain sizeable expansions on their extremities adjacent to Kings Langley and Dacorum. Kings Langley is currently creating a Neighbourhood plan that focuses on the needs of the Village and there is no local need established for a 10% increase in housing numbers. The thought that Dacorum have earmarked 200-275 homes for Kings Langley without any knowledge of Three Rivers plans, is irresponsible. Not least because the majority of the village is Green belt, including Rectory Farm. This land is the last green space between Kings Langley and Hemel Hempstead, contributing to the coalescence of both locations, contrary to Green Belt purpose.</p> <p>2020 has taught us how important outside space and green belt is to well-being and people's health. Local parks and open spaces are well used every time the weather is decent, demonstrating the increased need more open green belt space not less! Given we also have no sight of what Three Rivers Council are planning for its part of Kings Langley on the eastern side of the Grand Union Canal.</p> <p>There's no consideration for the impact of COVID on our housing, high streets, or office space, particularly as the latter two will rise due to deaths coupled with working from home. People have proved they can work from anywhere, the South East will become less attractive. Pressure on housing will diminish as people choose to have more space rather than central locations in cities. Office and retail space has to be considered for conversion to housing, if nothing else it would bring the High Streets back to life. Brexit had an estimated impact of reducing the population in England by 1.4m</p>

in 2020, many of them Europeans returning home. We are a smaller population now, than we were 2 years ago, and the demand on housing will be less.

Local infrastructure particularly local roads - already gridlocked at peak times and particularly the Hempstead Road. Simply increasing houses in Kings Langley by 10% when combined with the Nash Mills, Apsley and all other southern parts of HH will be utilising these gridlocked roads to access the M25.

Schools are full with Abbots Langley children who previously went to Kings Langley school are now taking long bus rides to schools in Watford. This increases pollution and compounds environmental concerns. Summer water shortages, and flooding - which we are already seeing in on the eastern side of the Village continue to grow. This green and pleasant lands is likely to become far worse as runoff volumes grow whilst access to water falls due to supply. The wildlife that inhabits the Green Belt will continue to suffer more as concrete, roads and new house take over.

Kings Langley is a historic settlement incorporating the site of a Royal Palace and is still meant to be a village, 200+ houses is a huge increase in population vs existing (10%), and a housing development of that size and scale will be visible from every vantage point. I would also be very concerned about the impact of 200+ houses on road safety on Hempstead Road, which is already an accident blackspot.

It has been many years since I even considered driving to London for meetings and now train services are exceptionally over crowded and pre-pandemic, I have often missed London meetings through the inability to get on the over-crowded trains.

The volume of new housing proposed is too high for each of the sites to accommodate and will overwhelm the infrastructure (current and proposed) for the areas. I am very concerned that this strategy is being driven by economic profit rather at the cost of local community and the natural environment. The transport infrastructure will not sustain this volume of new housing and consideration is not being given to the fact that a significant part of this development is taking place on green belt land which should be protected from development, on the edge of the Chilterns AONB. With climate change and the consequences of this becoming ever more pressing, clearing areas of woodland and wildlife for building will increase the risk of flooding in these areas and heighten the possible impact of climate change.

As a resident of Boxmoor I am concerned by the principle as stated in 5.2 about encouraging substantial increases in heights ... in the most accessible locations. Development must be sensitive to the local character.

It is hard to see the need for additional retail floorspace when Hemel Hempstead has numerous empty shops and we hear that Debenhams and Topshop are both likely to close.

I am against this proposal, as I wish to prevent adjacent towns merging together, to check the sprawl of large built up areas, to assist in protecting the countryside from encroachment and to preserve historic towns.

Additionally, traffic and services (e.g. GP and trains) are already stretched far too thin as things are, further development will completely overload the system. Just leave the land alone.

I am writing to express my objection to the use of green belt land on the outskirts of Kings Langley village at Rectory Farm. Any use of green belt land for housing or industrial development is unnecessary whilst there are brownfield sites and land which can be repurposed to achieve the same goal and minimise the destruction of wildlife habitats.

This particular proposed development site would reduce the boundary between Kings Langley and nearby Nash Mills and put extra strain on the main road through the village which is often very busy anyway. A new, additional junction on this road would inevitably increase the likelihood of congestion and potentially accidents.

"Providing growth in the villages that reflects their role and character;" - this bullet is critical for Kings Langley. It's a village that has seen growth already with the work around Kings Langley Station. I applaud the building on brownfield sites - just what we should be doing. The greenfield areas like Wayside Farm, should stay green as it is part of the character of the village and the green areas prevent KL from becoming one large conurbation with Apsley & Hunton Bridge/Watford. Your point 5.6 makes a sound point that growth levels should be modest

object to the proposed development on the Green Belt Land at Rectory Farm. This land separates Kings Langley from Apsley and is an important check to the sprawl of the already over built up areas along the canal. This land should be used to help protect the kingfishers that live nearby by creating a wildlife corridor along the canal and River Gade.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4689

**Person ID** 1264495

**Full Name** Ian Fyfe

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

The plan seeks to have Berkhamsted (and Tring) play a much greater role in delivering growth and describes Berkhamsted as being particularly suitable. "Berkhamsted will accommodate growth of at least 2,200 new homes" and "have provided significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town and have delivered a mix of market and affordable housing, new community facilities, including two primary schools and a secondary school, and a hierarchy of open spaces. It also states that it will secure "40% affordable housing on all new dwellings," with larger sites being designed to create and sustain socially inclusive mixed communities.

General comments

- To be particularly suitable for growth would require a modern road structure which can deal with the extra traffic which growth will generate and an infrastructure which has extra capacity built into it, particularly in the supply of primary care, utilities, waste handling and Berkhamsted has none of these. All roads, with the exception of the High Street, are narrow and winding and there is not a through road from the south to the north. It is not realistic to expect Berkhamsted to absorb so many houses without a finalised and acceptable Infrastructure Delivery Plan.
- The topography of Berkhamsted is particularly unsuited to both walking and cycling as a means of getting to and from any of the proposed sites and the town
- How was the proportion of affordable housing established? What evidence is there that socially inclusive mixed communities work?
- No increase in passenger transport for Berkhamsted is described in the plan contrary to the stated intention to do so. The only good bus service is the 500 service on the High Street. The train service is excellent, but parking at the station is frequently full on weekdays.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4706

**Person ID** 1264485

**Full Name** Charlotte Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** 64% of this plan is on Green belt. DBC has incorrectly taken the housing numbers from the Governments Standard methodology as a strict housing target and leads to a growth strategy at unsustainable locations at the cost of lots of the green belt. I think this plan should be reconsidered.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4724

**Person ID** 1152420

<b>Full Name</b>	MICHAEL AND PENNY WEBSTER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>It is incontrovertible that the UK needs more housing, albeit much more at the social housing end of the spectrum. One cannot fail to recognise that Dacorum, along with other planning authorities, will have had a difficult job weighing up all relevant factors in genuflecting to the perceived needs or aspirations of HM Government in terms of its targets for housing growth, all in a climate of change occurring with increasing regularity and sometimes from totally unplanned and unexpected quarters. Examples of such changes, since most of your work on the Local Plan was undertaken, will have been the Government's manifesto aim of "levelling up the country", placing more emphasis on helping economically deprived areas in the North of England and the not readily foreseeable Covid pandemic and its likely impact in creating sizeable spaces in retail shopping centres as more people move to online shopping. One only has to contemplate, for example, what might happen to the Harlequin Centre in Watford even before considering what seems to be happening there with the closure of John Lewis and some other key shops and their knock-on effect, to the Marlowes shopping centre in Hemel Hempstead.</p> <p><b>Should not the changes in shopping habits migrating to greater use of the internet provide more "brown land" than previously contemplated?</b></p> <p>As has been mentioned in the preamble above, before the numbered paragraphs, there is a seismic shift from local shops to online shopping . This started some years ago before the arrival of the pandemic. In our crowded island, we need to utilise any space which becomes available in the centre of towns . One can certainly visualise shops and stores being converted into flats and apartments with the result that shopping precincts can become living areas as well. Your report needs to be updated to reflect this trend.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4726
<b>Person ID</b>	1152420

<b>Full Name</b>	MICHAEL AND PENNY WEBSTER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>The likely impact on Green Belt land and areas adjacent to Areas of Outstanding Natural Beauty (AONBs)</b></p> <p>Your previous Core Strategy date 2013 stated in words to the effect that :”the open valley sides and ridge-top locations are especially sensitive to new building development in these locations and will not be supported.” This policy must surely be a very high bar to surmount if Green Belt land is now to be developed over. Our local landscapes remain an important recreational, scenically visual and vital breathing space between conurbations. It will amount to an abdication of responsibility by the local authority if development is ordained over areas of attractive landscape comprising part of Green Belt land adjacent to AONBs , a fortiori when there has been talk of a National Park being created in this area of the Chilterns as recommended in the 2019 Glover Report. There is a natural tendency in accommodating additional housing stock to tack on sectors adjacent to existing towns and villages. The danger of that is that of a ribbon-like development of dormitory housing sprawl rather than a self-contained area with a centre properly planned and integrated with small locally-based shopping area. Local government, no doubt greatly assisted by the New Towns Development Commission did this well in the post-war era. Could not such an approach be re-considered in this instance? This would necessarily mean no ribbon development and an essential part of the plan would be to maintain a reasonable distance between that new development and the next village or town. This situation has for a number of years pertained between Apsley and Kings Langley; the need to keep them apart being overlooked by the planners. It would be a travesty if the ancient market town of Berkhamsted with its long line of history were to be linked to Bourne End or Bourne End from Boxmoor and Apsley.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4751
<b>Person ID</b>	1261255
<b>Full Name</b>	Sarah Lightfoot
<b>Organisation Details</b>	

<b>Agent ID</b>	1261248
<b>Agent Name</b>	Sarah LIGHTFOOT
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Para 5.2 - <i>'Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites'</i></p> <p>I strongly support this - as did DBC in 2013. However they have turned their back on this in the current plan.</p> <p><b>5.5</b> <i>'The Growth Strategy for Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.'</i></p> <p>I submit that the proposed plans don't in any way meet this requirement. It will have a huge detrimental impact on the Green Belt and siting a vast series of housing estates at the top of a steep hill 3-4km from the town centre is in no way <i>sustainably located close to passenger transport and other services, facilities and employment opportunities.</i></p> <p>I strongly support the submissions made by BRAG relating to this section.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4754
<b>Person ID</b>	1264512
<b>Full Name</b>	THELMA FISHER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>I appreciate that the biodiversity is clear but the emerging plan is not explicit enough in showing just HOW Dacorum will work with developers and other stakeholders to check the loss of Green Belt land, increase biodiversity and meet both National and Hertfordshire's goals for climate change and carbon reduction .</p> <p>The Chilterns AONB and the Green Belt are beautiful areas which, once lost, cannot be regained.</p> <p>There is a good proportion of Green Belt and AONB land in Dacorum.</p> <p>In this time of the pandemic, Nature has been demonstrated to be so important to people and the value that Nature adds to our lives. Other areas and ways round this should and must be considered.</p> <p>On a summer's evening the chance to wander down Marshcroft Lane and stand on the canal bridge listening to the birdsong is a joy to be treasured. We need open spaces and not vacant brownfield areas in the midst of our towns.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4755
<b>Person ID</b>	1264512
<b>Full Name</b>	THELMA FISHER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The number of homes proposed for building surely should be reduced to well below the target number to reflect the actual need which has been demonstrated.</p> <p>A much proportion of houses and flats should be built on brownfield land or made possible through conversions, in the existing areas of not only Tring but Berkhamsted, Kings Langley, and Hemel Hempstead. There must be a main focus on affordable starter homes</p>

I suspect that this whole project is developer-led as of course it is easier to build on greenfield sites. Do they even know where the sites are? - I would guess not.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4757

**Person ID** 1264510

**Full Name** Martin Evening

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** The DLP 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 Dacorum Growth & Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4759

**Person ID** 1264491

**Full Name** Paul Wade

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	DBC are working to higher targets than required and using Green Belt land to achieve this
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4780
<b>Person ID</b>	1264475
<b>Full Name</b>	Simon Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Too many green field sites are being used. This will scar the beauty of the Chiltern country that is valued by Berkhamsted residents, and is part of the reason for living here.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4781
<b>Person ID</b>	399110
<b>Full Name</b>	Mr Jonathan Glaysher
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	Firstly, it would seem that the algorithm and data used to underpin the plan are erroneous and that far too many new houses are, therefore, being targeted for Dacorum. I, therefore, do not agree the Local Plan and housing numbers proposed.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4812
<b>Person ID</b>	1264527
<b>Full Name</b>	ELAINE RHODES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I wish to register my strongest opposition to the Local Plan and the number of new house builds being proposed. The housing numbers in the Local Plan across Dacorum are excessive and way above the forecast housing need for the Borough as calculated by the ONS - so why are you proposing this?
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4814
<b>Person ID</b>	1264528
<b>Full Name</b>	Ray Dann
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>After having a close look at the Dacorum plan I was shocked at the level planned building on our green belt. The government was elected on one of their promise’s to protect our green belt, so why this plan is so far removed. It is evident to me that numbers do not add up and impact on the town I live in will be dramatic and irreversible. The South Berkhamsted project did the rounds a few years ago, and for good reason was rejected by Berkhamsted Town, DBC, and the inspector and then the developer took their case to court and lost, and now it finds itself back in the plan with minimal changes, why?</p> <p>Government that shows the policy on Green Belt protection is clear and unambiguous: 1 The NPPF provides protection for Green Belt and the land due to be released around Berkhamsted clearly pass the tests. 2 In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming “demand for housing alone will not change Green Belt boundaries”. 3 Paragraph 9 of the 2017 DCLG “Planning for the right homes in the right places: consultation proposals” 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 Berkhamsted Residents Action Group (BRAG) Draft Response to DBC Draft Local Plan Consultation 1 4 F e b r u a r y 2 0 2 1 P a g e 6   46 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.” 4 On December 16th 2020 the Government published a response to the recent white paper consultations.</p> <p>With reference to protected landscapes and Green Belt it states “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.” 5 The same response goes on to state “We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.” 6 And further clarifies “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’s sole justification for accepting Government’s numbers (922dpa) as a strict target is simply that “Any option below the standard methodology would have to be robustly justified” (paragraph 5.8 of The Development Strategy Background Topic Paper). Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I fail to understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified”.</p>

DBC have seem to mis-understood their responsibilities. Paragraph 136 of the NPPF is clear “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified’, and not the other way round. Paragraph 19.6 of the Plan does say “In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries.’ But, beyond that statement there is absolutely no justification offered, except the Government ‘target’ that isn’t actually a ‘target’. Readers of paragraphs 19.6 and 19.7 in the ‘Managing Development in the Countryside’ section are directed to the Sustainable Development Strategy chapter of the plan for justification, but I am at a loss to see anything in paragraphs 4.1, 4.2, 4.3 or Policy SP1 that could remotely be described as “fully evidenced and justified” as required by the NPPF. Indeed 19.7 also specifically states DBC have “identified those areas on the edge of the main settlements where exceptional circumstances exist”, thus inferring that exceptional circumstance exist for the settlements protected by the specific Green Belt releases. These “exceptional circumstances” are certainly not evidenced.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4826

**Person ID** 1264521

**Full Name** Max Hidalgo

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

The consideration of office space in these current times needs a review. The majority of companies are now asking and expecting most office workers to carry out a significant amount of their time from home with the majority of companies expecting a down size or change of space due to the lower occupancy. Therefore the plan should consider this change of the new way we work.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4832

<b>Person ID</b>	1264524
<b>Full Name</b>	Karen Kang
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The strategy of growth seems to be fundamentally flawed by the excessively high calculation around the housing target. Also the plan to put 4,000 homes released from the Green Belt (the idea of which I had thought was to safeguard the land) when there is a large amount of accessible land around the Maylands and towards St Albans seems to be against all the objectives around sustainability and completely unnecessary.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4836
<b>Person ID</b>	1264531
<b>Full Name</b>	PAUL KENT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4868

**Person ID** 1264533

**Full Name** MAURICE OKEEFFE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4888

<b>Person ID</b>	1150594
<b>Full Name</b>	Catherine and Mark Richardson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>W strongly object to draft Policy SP2. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a important requirement for the Council not to undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead.</p> <p>No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was</p>

appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4901

**Person ID** 1264536

**Full Name** Mr George Harvey

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4905

**Person ID** 1264537

**Full Name** KATHERINE COURTNEY

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p>

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4923

**Person ID** 1264540

**Full Name** JOSEPH DAWSON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4933

**Person ID** 1260771

**Full Name** JAMIE BELL

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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<b>Included files</b>	
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<b>Title</b>	Spatial Strategy for Growth
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<b>ID</b>	EGS4946
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<b>Person ID</b>	1264546
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<b>Full Name</b>	Dr Calvin Veeroo
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<b>Organisation Details</b>	
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<b>Agent ID</b>	
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<b>Agent Name</b>	
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<b>Agent Organisation</b>	
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<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would</p>

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4952

**Person ID** 1264544

**Full Name** Bethan Fox

**Organisation Details** Personal comment

**Agent ID** 1264539

**Agent Name** Bethan  
Fox

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

We need more housing. However, the projected requirement for the number of new homes is double the level it should be within the Borough (and government will take advantage of this over-projection compared with other 'commuter regions'). The projections should be based on 2018 ONS numbers rather than 2014 numbers which would approximately halve the projected requirement across the Borough to a more realistic 351-536 built annually.

In addition, while I appreciate that Hemel Hempstead is taking the bulk of the development it cannot really be compared with Berkhamsted and Tring. Hemel is a far more modern conurbation around the M25/ M1/ A41 intersections. Being more modern it has wider main roads to take the additional traffic that will result from the additional housing. By contrast, Berkhamsted and Tring are old market towns which are already grid-locked at busy times.

With the additional proposed housing being on green belt rather than brown field sites and therefore away from the centres of the towns will stimulate even more car use and exacerbate the problem further.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS4970
<b>Person ID</b>	1264548
<b>Full Name</b>	Mrs Sasha Godfrey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p>

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS4989

**Person ID** 1264549

**Full Name** Mrs Kate Carter

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS4990

<b>Person ID</b>	1263960
<b>Full Name</b>	Mr Tim Amsden
<b>Organisation Details</b>	Chairman Tring & District Local History & Museum Society
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	It is not remotely plausible to increase a town's population by 50% without impinging on its character. In Tring's case the development does not 'minimise' the development of the Green Belt, it relies entirely on doing so, negating the point of having designated it. Population growth on this scale cannot fail to detract from its character and will not enhance the town centre in any shape or form. No account has been taken of pressure on local hospitals. Tring people mainly use Stoke Mandeville which is stretched to the utmost by continuing growth in Aylesbury. Development in Buckinghamshire would not appear even to be mentioned.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5026
<b>Person ID</b>	1264557
<b>Full Name</b>	Natalie Crane
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing

target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5049

**Person ID** 1264258

**Full Name** Fintan FitzPatrick

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1. The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5070

**Person ID** 1264550

**Full Name** Kevin Fielding

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	<p>The phrase "Minimizing and managing the requiremnt for development on Green Belt land and impact on Chilterns AONB anbd other protected sites" is the issue here. To fulfil national sustainability and environmental critera there should be no development on Green Belt. There should be no impact on Chilterns AONB, SSSI etc.</p> <p>The approach is fundamentally flawed. There is an assumption that growth beyond that possible with current planning regulations in urban areas is required. And that this growth must be achieved by expanding urban area rather than by changing planning limits. These tow assumptions are at odds with the views of all the local residents I have talked to and should be challenged. Firstly, I have found no support for any increase in the footprint of Berkhamsted from any local residents. Secondly, the multi-story car park in Central Berkhamsted is a clear example of where urban planning limits can be adapted to improve capacity. There are brownfield sites within Berhamsted, Tring and Hemel Hempsted where #this could be achieved. I think there has been a distortion of the reality of possible existing urban options based upon the undoubted financial benefits to developers of green field development.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5081
<b>Person ID</b>	1264532
<b>Full Name</b>	Robert Clarke
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Berkhamsted does not need any significant growth to maintain its function as a key market town. Additional large scale housing will completely swamp the retail medical and transport facilities of the town and impair its individual nature.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5150
<b>Person ID</b>	1264509
<b>Full Name</b>	Hannah Fox

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We need more housing. However, the projected requirement for the number of new homes is double the level it should be within the Borough (and government will take advantage of this over-projection compared with other 'commuter regions'). The projections should be based on 2018 ONS numbers rather than 2014 numbers which would approximately halve the projected requirement across the Borough to a more realistic 351-536 built annually.</p> <p>In addition, while I appreciate that Hemel Hempstead is taking the bulk of the development it cannot really be compared with Berkhamsted and Tring. Hemel is a far more modern conurbation around the M25/ M1/ A41 intersections. Being more modern it has wider main roads to take the additional traffic that will result from the additional housing. By contrast, Berkhamsted and Tring are old market towns which are already grid-locked at busy times.</p> <p>With the additional proposed housing being on green belt rather than brown field sites and therefore away from the centres of the towns will stimulate even more car use and exacerbate the problem further.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5185
<b>Person ID</b>	1264593
<b>Full Name</b>	Rebecca Mackenzie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	What is needed in Dacorum is secure, low cost housing, social housing, not your idea of affordable housing, which is really not very affordable for most people.

How much growth is actually needed in this area?  
How much water do we have? I understand that is in short supply?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5204

**Person ID** 1264608

**Full Name** Nicola Beadle

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

We need more housing. However, the projected requirement for the number of new homes is double the level it should be within the Borough (and government will take advantage of this over-projection compared with other 'commuter regions'). The projections should be based on 2018 ONS numbers rather than 2014 numbers which would approximately halve the projected requirement across the Borough to a more realistic 351-536 built annually.

In addition, while I appreciate that Hemel Hempstead is taking the bulk of the development it cannot really be compared with Berkhamsted and Tring. Hemel is a far more modern conurbation around the M25/ M1/ A41 intersections. Being more modern it has wider main roads to take the additional traffic that will result from the additional housing. By contrast, Berkhamsted and Tring are old market towns which are already grid-locked at busy times.

With the additional proposed housing being on green belt rather than brown field sites and therefore away from the centres of the towns will stimulate even more car use and exacerbate the problem further.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5210

**Person ID** 1262647

**Full Name** Carolyn Wallis

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	While the aim of minimising development on Green Belt is to be applauded, and some of this is achieved by increasing heights of buildings, care should be taken to avoid high buildings around the Station Gateway site. This overlooks Station Moor land and is backed by Roughdown Common, an area of Special Scientific Interest - any development in the area should avoid spoiling the view of or from these areas.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5213
<b>Person ID</b>	1264601
<b>Full Name</b>	Tania Barney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Government has made it clear that the numbers are a starting point only and it is up to Local Authorities to know if local constraints such as Green Belt means that the numbers cannot be delivered. Clearly this is not the case in this proposal, and should be challenged.</p> <p>Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I fail to understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified”. Paragraph 136 of the NPPF is clear “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”.</p> <p>The Draft Local Plan offers no proposals for any growth of employment opportunities in Berkhamsted, thus promoting what realistically will be increased high-carbon travel for work. The vast majority of housing growth is to be sited on valley</p>

side and ridge-top Green Belt land sited at a distance (3-4km) from the town centre and railway station, with steep gradients that will only promote high-carbon forms of travel rather than the stated reference of walking and cycling. It is unclear how the 'historic character' of the town will be protected, and building on the 'outskirts' will significantly increase traffic in the town centre.

Berkhamsted lies in a valley, it's is becoming developer led rather than planning led and this Draft Local Plan as proposed is facilitating that process. I believe that given its current size and topography, Berkhamsted has reached its limits of capacity. As conceded by DBC, the town centre already suffers from congestion and poor air quality (especially on Lower Kings Road). Building more edge of town developments on valley side/ridge-top Green Belt locations at a distance (3-4km) from the town centre and railway station to satisfy flawed housing targets is not sustainable in any sense of the word. These plans will not enhance the quality of life for residents current or future.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5255
<b>Person ID</b>	1175740
<b>Full Name</b>	Berkhamsted Schools Group
<b>Organisation Details</b>	The Berkhamsted Schools Group
<b>Agent ID</b>	1175743
<b>Agent Name</b>	Kevin Rolfe
<b>Agent Organisation</b>	Group Director, Development & Planning Aitchison Raffety
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Within <b>Policy SP2-Spatial strategy for growth</b> , we support that growth in Berkhamsted “will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.” Indeed, these new investments will directly flow from the implementation of the allocation at Haslam Field, site BK03, for housing and the provision of the enhanced sports facilities at Haresfoot, site Cy04.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5258
<b>Person ID</b>	1263726
<b>Full Name</b>	Andrew Gifford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Should DBC wish to support retail development it should look at the vast number of established businesses being pushed from the highstreet with extortionate rent and rates. With the impact of COVID and the recent drive for business parks where buildings such as Bunning (formerly Homebase) now remain unoccupied the plan is outdated and not fit for the current and changing needs of our communities.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5318
<b>Person ID</b>	1264616
<b>Full Name</b>	Philip Daw
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt

releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.  
Will we have an opportunity to comment on the sang to Natural England?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5348

**Person ID** 1264599

**Full Name** Mike Keeble

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Such a large husing devlopment in Berkhamsted and Tring would not be within keeping of the towns respective characters. Both places are beatiful towns and very desirable places to live. Such large developments will only serve to diminish both towns.  
Is such growth actually still required? the Covid pandemic has surely accelerated the shift to more and more people working from home. A more up to date assessment must be made.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5373

**Person ID** 1264048

**Full Name** Alison Fraser

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Brownfield sites should be used before Green belt or green areas within existing developments. The type of housing that is most needed must be built first; rather than allow developers to cherry pick. Your plan does not say what affordable means. To me this would be no more than £250,000 for a starter three-bedroom home with garden and parking. I know they can be built for less than this (as I know someone who three years ago, built a new three bed home on their previously detached home for less than £200,000).</p> <p>You acknowledge that the infrastructure is 'constrained' in the larger villages (Bovingdon, Kings Langley and Markyate); but you plan to build anyway without any plans to improve the infrastructure. These sites should not be built on first, unless there are going to be significant improvements to the infrastructure; although I suspect the developers will want to cherry pick to maximise profits, and try and sugar coat that improvements will be made, when in reality greater pressure will be put on the already strained infrastructure.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5389
<b>Person ID</b>	1264628
<b>Full Name</b>	sophie boden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	If one of your concerns is choosing a location that has employment opportunities then why are you trying to close a big local employer (the BFI) and build on their land? Or are you not trying to increase job opportunities in the town? Just housing?
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5417

<b>Person ID</b>	1264636
<b>Full Name</b>	Lynsey Bilsland
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The projected numbers of new houses needed are no longer justified by the latest data. The infrastructure of the town, including the proposals, will not be sufficient to support the growth as included in the plan. The removal of Greenbelt land will have a negative impact on the community and generations to come. The justification for removal of Greenbelt land, which never be undone, is not justified by the data. Dacorum Borough Council has incorrectly taken the numbers for new houses from Government as a strict target and will result in unsustainable growth at unsustainable locations.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5449
<b>Person ID</b>	1264648
<b>Full Name</b>	Lydia Whelan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Whilst appreciating the need for overall strategy I am concerned that the "market town" character of Tring and Berkhamsted will be changed very substantially with such a large increase in the population planned. Tring has a charm based on being a small town influenced by its Rothschild heritage and a range of trades based on rural skills and independent shops - most of which will be lost/changed by the size of the growth.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5454
<b>Person ID</b>	1264647
<b>Full Name</b>	Richard Burnell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	RRepurposing Browngield sites will provide more efficient use of space. Infrastructure will be in place and provide a more cost effective solution than the current proposals.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5523
<b>Person ID</b>	1264617
<b>Full Name</b>	Victoria Latham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The projection of housing need locally, based on official population projections - figures from Herts Insight via link on Dacorum website - is much lower than the planned 16,889 homes.

The 2019 Dacorum population is 154.7k, 2041 projection is 177k and the plan runs to 2038. Current homes are 59,983 with density of 2.6 people per household. If an additional 16,889 homes are built, that is a household density of 2.3. Why do Dacorum households would drop by 0.4 people per house in twenty years, when locally that isn't the case and the influx from London is largely couples with or about to have children?

Post-pandemic it is inevitable that significant town centre office accommodation will remain vacant, with a permanent shift towards remote and flexible working, in addition to the closure of some firms. This excess capacity would be best re-purposed into residential dwellings to revive town centres and the pressure on the greenbelt. It would also ensure that existing transport links and other infrastructure could be re-purposed, rather than having to start 'from scratch' in new developments and prevent further hollowing out of our town centres.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5535

**Person ID** 1264657

**Full Name** Amanda Hutchinson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

5.2 There is little evidence of a desire to minimise development on green belt land - most of the proposed development in Tring is on green belt land.

5.5 This makes no sense in the context of the actual plan, which provides for a massive expansion in Tring and Berkhamsted, inevitably changing the character of these towns, both by the sheer increase in population and by siting development away from the current town centres, resulting in a fragmentation rather than a reinforcement of community.

Government numbers are a starting point, not an inflexible end. The borough should be arguing that the numbers need to be adjusted down because of the particular local circumstances, including the inability to build the proposed number of new homes without significant detrimental impact to the green belt and AONB.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS5536
<b>Person ID</b>	1264652
<b>Full Name</b>	Gillian Macdonald
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	It is important to build more affordable homes for families. Having lived through this pandemic it is clear that families need gardens. Housing should not be all about profit but quality of life and developments should be sustainable, trees and green areas should always be incorporated. If building in villages all developments should be in keeping with the locality. No blocks of flats towering over existing homes. Elderly people will not want to live in villages where there is no bus service or shop. They also will not want to live in noisy flats or maisonettes so building this type of housing in villages is completely pointless. People should be provided with affordable homes with gardens.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5597
<b>Person ID</b>	1264679
<b>Full Name</b>	Paul Firth
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	There is a 24% proposed increase in housing in Berkhamsted (more than 900 homes) and a 50% increase in Tring. Whilst I accept that we must take some share of the new houses within these areas, the outdated housing projections

used by DBC based on the 'mutant algorithm' used mean that the percentages taken in these areas are too great and unnecessary. I urge DBC to challenge the numbers dictated by central government rather than just accepting them.

Also, nearly all the development proposed will be on Greenbelt, which is against government policy. Why is this being allowed? This will not help the future growth of the area or sustainability. A green buffer is needed between the A41 and Berkhamsted due to the increased traffic on this road.

Please can DBC look at Brownfield sites before building on the Greenbelt? Has this been done? If not, why not, and if so, could we please see the results of any studies undertaken?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5613

**Person ID** 1144878

**Full Name** Mr Peter Moore

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The growth of villages has taken place naturally over centuries. The present proposals suggest the forcing of village growth which does not and cannot take account of natural growth. Such forced growth will devalue and destroy village heritage and the integrity of rural living. There will be no need to destroy any designated Green Belt areas if the development proposals are revised to be more realistic and pragmatic.

If the government stands by its commitment to improve the north of England, the need for the over development of Dacorum will be eliminated.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5629

**Person ID** 1264689

**Full Name** Philip Hobden

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5656
<b>Person ID</b>	1264710
<b>Full Name</b>	Jess Malcolm
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I disagree, these strategies would be more beneficial to the community if we fixed what was already built, making building safer to inhabit, cleaning the streets etc. Expandnoig will not fix anything it is an act of running away from communities that need funding, regeneration and support.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5708

Person ID	1264473
Full Name	Jane Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Spatial Strategy for Growth comment	The additional site proposals made in the Strategic Housing Land Availability Assessment November 2020 .Addendum to the AECOM. Site Assessment Study <b>directly contravenes</b> the strategy outlined here in points e and f for the development at Long Marston
Included files	
Title	Spatial Strategy for Growth
ID	EGS5709
Person ID	1264726
Full Name	Annie Heaton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Spatial Strategy for Growth comment	The draft Plan puts sustainable development at its heart, and contains many strong aspects. Yet it is predicated on the removal of Green Belt land, which based on two serious flaws: an unjustifiably high number of new homes, based on outdated data, and a failure to fully evaluate the the full range of value provided by Green Belt to residents in Dacorum and beyond, including air quality, recreation, physical and mental health and carbon sequestration. In planning for an unnecessary number of homes, the Plan risks removing valuable Green Belt status unnecessarily.

The draft Plan cites 922 homes per year, but the latest minimum number under the MHCLG calculation (16 December 2020) requires this number to increase to 1023 homes per year. Quite unreasonably, this number is based on 2014 ONS housing need data, rather than 2018 data. If ONS projections of housing need in 2018 for Dacorum were to be used, the number would be 355 homes per year. Even applying an ‘uplift’ of 40% in order to allow the government’s approach of improving affordability by increasing the supply of homes, this number would be 499 homes – less than 50% of what is currently required for Dacorum.

Furthermore, the draft Plan takes **no account of the impacts of Covid and Brexit**, which are both likely to create a step change in the way in which people live and work, and so need for domestic and commercial property. It is therefore vital that the Local Plan for Dacorum is revised based on recast socio-demographic projections that take these dynamics into account.

If these numbers are to be substantially revised, then comments received during this consultation may not be relevant to the actual proposals for the Local Plan. Indeed this public consultation process may be rendered invalid, and a new Local Plan subject to a further public consultation.

### **Removal of Green Belt land**

#### **The Local Plan lacks information that justifies the destruction of natural assets in the borough as a result of the strategy envisaged.**

Whilst planning for irrationally high and excessive numbers of new homes, the Local Plan proposes the destruction of Green Belt, without having seriously evaluated the enormous value generated by Green Belt land and other natural assets to the residents of Dacorum.

Green Belt is established as a whole system, rather than a combination of marginal pieces of land. NPPF 136 only permits the removal of Green Belt status *in exceptional circumstances*. The need for new homes is not understood to provide such circumstances. Yet the local Plan does not demonstrate the ‘exceptional circumstances’ that justify the removal of Green Belt – an irreversible move. As eminent economist and government advisor Professor Dieter Helm argues, “Irreversibility places the onus on those who would destroy it to prove that the optimal Green Belt is smaller now than it was when it was created.”

On a personal level, I strongly object to the removal of Green Belt land envisaged by the Local Plan, since these proposals are based on an inflated basis of housing need, no recent investigation of brownfield development potential after Covid and Brexit, and insufficient information of impact. As a result, there is a real danger the Local Plan will result in impacts that run counter to the long term social, climate, sustainability and even economic objectives of the Strategy for Growth itself, and the legally binding Net Zero by 2050 target of central government.

The assessments of Green Belt undertaken for the Plan in Stage 2 Green Belt Review and Landscape Appraisal focuses on its value in terms of formal purposes of Green Belt, and the extent to which development should be tempered by ‘constraints’. This **fails to approach Green Belt as an asset with high and multiple value**: as well as the biodiversity value generated by soils, hedgerows, scrublands, chalk stream habitats, woodland and green corridors – all of which must be accounted for under the Biodiversity Net Gain requirement - Green Belt land is valuable in improving air quality and preventing pollution; it is a significant carbon sink with the potential to grow its carbon storage if well managed; and

it is the source of enormous social and health benefits to local residents, who enjoy using it for social activities and physical exercise – not only in recognised sites of natural value but all green spaces.

Currently, the assessments of Green Belt and spatial planning options used are not aligned: the Sustainability Issues and Objectives within the current Interim Sustainability Appraisal Report of November 2020 are not the same criteria as used in the Green Belt Review and Landscape Appraisal – unsurprisingly as they are undertaken by different consultants at different times. As a result, the considerations of one appraisal may not have been consolidated with the findings of the Green Belt Review of potential sites for development. A common framework and set of metrics is needed.

**It is recommended that a comprehensive and consistent ‘natural capital value’ framework is adopted by DBC.** This would be used to evaluate and capture the economic value of the natural surroundings, including and especially in Green Belt land, in a consistent **baseline assessment of value generated by the natural assets of Dacorum**, and the impacts of the Local Plan clearly laid out in relation to this baseline.

Unless such consistent assessments are undertaken, the true value of our natural assets cannot be understood when considering the merits of the spatial strategy for new housing developments. Nor can DBC understand the relative value of the Green Belt being compromised by the Plan. The Natural Capital approach applies a financial value. Such an approach enables a fair comparison of value loss with value gain, and forces stakeholders to consider the consequences of the trade offs involved with developments.

An example of such a study is provided by the London Borough of Barnet, conducted on a broad natural capital basis in line with the guidance on Corporate Natural Capital Accounting (CNCA), including from the UK Natural Capital Committee and the international Natural Capital Protocol as well as existing CNCA examples.

<https://barnet.moderngov.co.uk/documents/s40941/Appendix%20%20Natural%20Capital%20Account%20for%20Barnet.pdf>

Against this baseline, DBC policy should require all development activities to account for the destruction of a consistent types of value involved – CO2 storage, natural habitats, social and health value – alongside the value new developments would create. The Interim Sustainability Appraisal report has started this process but as noted, it is inconsistent with the appraisal of Green Belt sites.

**If the full value of Green Belt and other green spaces were consistently accounted for, the *net additional value* of the new developments would, in reality, be significantly lower than is assumed in the Plan**, to the detriment in the lifestyle of Dacorum residents. If the very high number of houses slated for Dacorum turn out to be unmatched by demand, the net benefits could in fact be negative.

Publication of the existing financial value contributed by natural assets in Dacorum would be a means of educating residents, council officers, councillors and most importantly developers about the trade-offs involved in building the town's future. Residents could, for example, be consulted on the balance of value in more high-density in-town developments or more low-density developments built on Green Belt. Where new homes need to be built in Dacorum, far more transparent evaluation and far better-informed public consultation of the options available is needed.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5721
<b>Person ID</b>	1264678
<b>Full Name</b>	Tom A
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5759
<b>Person ID</b>	1264697
<b>Full Name</b>	Nicholas Wood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>I don't know where to begin! You propose to remove vast swathes of green belt land without proven need in the light of all the changes that have occurred in the last 5 years with Brexit and Covid. Every assumption you have made is from a different age! You are planning for ' additional retail floorspace' when the homeshopping / Amazon revolution is decimating companies as big as Arcadia and leading to vast swathes of the high Street laying dormant. The criteria for house building plans you are using are outmoded and based on old data that predates both COVID and Brexit. A recent Bank of America report sees no increases in the workforce in London in the next 5 years due to falls in office based working and Brexit related immigration changes yet you insist on drawing up housing targets based on immigration and working data from another era. You intend to keep office floor space the same when the Covid led home working revolution is decimating the need for office space as proven by falling office rents all over London and the South East. Your planning forecasts and assumptions are totally broken.</p> <p>The release of green belt land is supposed to be only in 'exceptional circumstances'. I do not believe those circumstance exist any more, or at the very least the assumptions underlying them need to be revisited in the wake of Brexit and the home working revolution that has been unleashed by Covid. Berkhamsted and Tring particularly have no need of the ruinous housing targets you have planned. Please revisit your planning assumptions urgently in the light of what has happened to society since 2016.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5815
<b>Person ID</b>	1264750
<b>Full Name</b>	Neil Joyce
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Tring, Berkhemsted and Hemel all have very different characters, and by trying to fit them into the same strategy to be balanced will change these towns immeasurably.</p> <p>Mention is made of schools and health provisions, but the infrastructure such as water supply and waste water management are not covered. This is an important consideration when trying to make best use of natural resources.</p>

The quoted number of 2,700 new homes for Tring is out of scale with the current size of the town, and the current sports facilities, of which there are a large number, provide more than enough capacity for the current (and future) population. Any expansion of Tring will have an impact on the Chilterns AONB because the town currently sits in a hollow and from a great number of locations in the countryside around the town, the buildings are either hidden or do not impose on the panoramic skyline.

A post-pandemic review of the required office floorspace should be conducted, as well as the need for additional retail capacity, especially when there are a large number of vacant shops in Tring High Street.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5829

**Person ID** 1264755

**Full Name** Jane Edmonds

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I believe the strategy for growth needs to be reconsidered in light of Covid and potential changing lifestyles - for example will all the office space still be needed?

Also the plan is an overdevelopment of the area and could adversely affect the smaller towns such as Berkhamsted and Tring - also these areas are unlikely to provide affordable housing.

The whole plan seems like a massive overdevelopment of the area and will spoil what is good about living here.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS5830

**Person ID** 1264752

**Full Name** Chris Brown

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>As mentioned earlier, the town centres of Berkhamsted and Tring already suffer from congestion and suspect air quality, For example, data for Lower Kings Road in Berkhamsted shows the level of NO2 in some periods exceed the 40micrograms/cm3 limit, albeit that the annual record does not show exceedances. In many respects at its current size and topography Berkhamsted has reached the limits of capacity as evidenced by traffic congestion, shortage of school places at primary and secondary levels, GP and associated services, sports facilities and in-town open space. I do not agree that the substantial increase imposed on the Town will enhance the quality of life for residents, current or future.</p> <p>I would also point out that the Housing Growth numbers in the Plan is based on flawed assumptions, Para 5.3 – 5.5 [P30]</p> <p>The proposed housing sites are not Urban land as you say you intend to develop, rather they are Green Belt corridors. 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. They are not near any passenger transport or other services, facilities or employment opportunities.</p> <p>In SP2 3B Berkhamsted will accommodate growth of 2,200 new homes.</p> <p>The Adopted Core Strategy (2013-2036) para 6.2.8 identified capacity (not “need”) in Berkhamsted of 600. Only eight years later this statement indicates that Berkhamsted will have an additional 1600 homes imposed upon it.</p> <p>There is no credible forecast that says this many homes needed or evidence that explains how the environment and infrastructure can cope. The recent years of significant house building in Berkhamsted seem to have gone unaccounted for.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5867
<b>Person ID</b>	1264768
<b>Full Name</b>	Paul Shepherd
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Its horrific
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5875
<b>Person ID</b>	1264354
<b>Full Name</b>	Juliet Penaliggon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We need more housing. However, the projected requirement for the number of new homes is double the level it should be within the Borough (and government will take advantage of this over-projection compared with other 'commuter regions'). The projections should be based on 2018 ONS numbers rather than 2014 numbers which would approximately halve the projected requirement across the Borough to a more realistic 351-536 built annually.</p> <p>In addition, while I appreciate that Hemel Hempstead is taking the bulk of the development it cannot really be compared with Berkhamsted and Tring. Hemel is a far more modern conurbation around the M25/ M1/ A41 intersections. Being more modern it has wider main roads to take the additional traffic that will result from the additional housing. By contrast, Berkhamsted and Tring are old market towns which are already grid-locked at busy times.</p> <p>With the additional proposed housing being on green belt rather than brown field sites and therefore away from the centres of the towns will stimulate even more car use and exacerbate the problem further.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5926
<b>Person ID</b>	1264785
<b>Full Name</b>	Thomas Lloyd-Evans
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5967
<b>Person ID</b>	1151388
<b>Full Name</b>	Mrs Aileen MCVEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council’s inner settlement plans and their assessment of housing needs.

**Included files**

**Title**

Spatial Strategy for Growth

<b>ID</b>	EGS5987
<b>Person ID</b>	1264797
<b>Full Name</b>	Robert Diehl
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>2200 new houses in Berkhamsted will be built on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (the government states it is not a target) and leads to a growth strategy at unsustainable locations at the cost of the loss of large areas of the Green Belt forever.</p> <p>In Berkhamsted, the Green Belt sites indentified for development are not within walking distance of public transport or the centre of the town. The reality of the situation will be that many more people will drive to either the railway station to commute to London or to the centre of town adding to the already existing town centre congestion.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5990
<b>Person ID</b>	1264796
<b>Full Name</b>	Patrick Hughes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>The target or over 16000 new homes is far too high ,latest projections are only IRO 350. In Dacorum we do not need or require that huge number. This will simply provide new homes for people from outside the area and put additional burdoen on the infrastructure.</p> <p>High rise developments will simply provide future slums.</p> <p>What we need are houses, why is it that all new development in Berkhamsted is houses yet in Hemel Hempstead itself you are advocating high rise. Families need a garden on a balcony. If it is good enough for Berkhamsted it is good enough for Hemel.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS5995
<b>Person ID</b>	1264809
<b>Full Name</b>	Sue Selfe
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p>

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6003
<b>Person ID</b>	1264030
<b>Full Name</b>	Sean Collier
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am skeptical as to how Tring and Berkhamsted will retain their character and have their town centres enhanced. Land for 4000 homes being released from the Green Belt also appears quite high. However, improvement to transport in Tring, especially to the train station, would be beneficial, and affordable housing is vital. Although, I have been made aware that the housing needs and the minimum to be built do not equate.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6017
<b>Person ID</b>	1264763
<b>Full Name</b>	Corran Griffin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Focusing on building on the outskirts of towns means the developments are some distance from the existing transport infrastructure. In particular the railways stations and links to the motorways/main roads. This will lead to more congestion on the roads as traffic tries to fight through.

The proposed link road doesn't seem to link to anything! Traffic from Berko and Tring will need to use narrow and/or single lane roads through the villages to join the link road, thus exporting Hemel's traffic problems to Water End, Great Gaddesen, Potten End etc which are not equipped to deal with more traffic. There is no reference in the Local Plan which explains how the existing routes will cope with the increased traffic volumes.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6029

**Person ID** 1145998

**Full Name** Mrs Pauline Hughes

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Very concerning:-"maximise the amount of development on previously developed land within existing urban areas but taking this concept much further in Hemel Hempstead by proactively encouraging substantial increases in heights and densities in the most accessible locations".

Definitely seems to encourage tower blocks at Two Waters over looking Boxmoor. Boxmoor , the surroundings and the views has saved our lives during Covid year and needs to be protected from developers aiming at London commuters with London salaries. to quote a previous developer's description "not suitable for elderly and families". Boxmoor is not Hemel Town Centre it is a village.

The principle 'Providing growth in the villages that reflects their role and character' should apply.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6033

**Person ID** 1264772

**Full Name** Adrian Slade

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6080
<b>Person ID</b>	1264816
<b>Full Name</b>	Christopher Nicholls
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6098
<b>Person ID</b>	1264855
<b>Full Name</b>	Joanna LARKINSON
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6130
<b>Person ID</b>	1264511
<b>Full Name</b>	Marianne Ball
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I disagree with the approach to growth, in particularly seeking to "maximise urban capacity" in Berkhamsted, which this plan claims will not detract from character. It will do the opposite to everything this plan claims to be trying to achieve. The growth and sites proposed in Berkhamsted, with large soulless estates at the top of steep hills to the south of the town, bought by an affluent car owning population, will simply destroy its character. Everyone will be driving to and from town, in a road network which cannot sustain it. This will pollute and choke Berkhamsted, and undo any hopes of achieving targets around pollution, as well as damaging all the other ambitions for community, employment and the economy, because the town centre will simply become a horrible place to be. This a blunt proposed strategy, chosen for perceived simplicity instead of the reality of actual impacts.</p> <p>I have no doubt of the challenges of enabling housing growth in this area, but this bolt-on solution to Berkhamsted is based on unrealistic assumptions and no real practical ability to deliver the travel instructure/changes on which this development depends. This is a hard challenge, so needs a more considered, complex solution based on growth across a broader range of sites, with grouped infrastructure serving several areas and not retro-fitted, but designed from the outset for sustainability.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6134
<b>Person ID</b>	1264824
<b>Full Name</b>	Anne Pattinson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The 'important market town' of Tring will be less of a 'market town' without it's market!
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6140
<b>Person ID</b>	1264834
<b>Full Name</b>	Ilina Jha
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	5.3 says that 'we cannot accommodate all the growth within the urban area, so [...] we do need to release land in the Green Belt.' However, as I said before, the Government housing numbers are for guidance only - they are not targets - and local authorities should be aware if things like Green Belt mean that these numbers cannot be reached. In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs in which it was confirmed that 'demand for

housing alone will not change Green Belt boundaries'. On 16/12/2020, the Government published a response to the recent white paper consultations. In this response, the following is stated: '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.' Therefore, the number of new homes planned should have been decided with an understanding of the Green Belt boundaries; the Green Belt boundaries should NOT be altered by a set number of homes.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6161

**Person ID** 1264731

**Full Name** Graham Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I object to the scale of development proposed at Tring. The reasons for adopting the spatial strategy for growth do not seem to recognise that some of the options ruled out (e.g. development of the larger villages and use of brown field sites such as Bovingdon Airfield) through lack of infrastructure, are also applicable when applied to the large-scale development proposed at Tring. Large-scale developments as proposed at Tring but delivered at the larger villages would be beneficial to those communities e.g. provide schools, larger shops, sports facilities.

While the strategy talks about preserving the role and character of villages, the role and character of Tring would change for the poorer with the proposed scale of development.

By focusing more growth on the larger villages and some small scale development in smaller villages it would help the sustainability of those places, and allow the numbers in Tring to be considerable reduced.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS6177
<b>Person ID</b>	1264872
<b>Full Name</b>	Ben Penalggon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We need more housing. However, the projected requirement for the number of new homes is double the level it should be within the Borough (and government will take advantage of this over-projection compared with other 'commuter regions'). The projections should be based on 2018 ONS numbers rather than 2014 numbers which would approximately halve the projected requirement across the Borough to a more realistic 351-536 built annually.</p> <p>In addition, while I appreciate that Hemel Hempstead is taking the bulk of the development it cannot really be compared with Berkhamsted and Tring. Hemel is a far more modern conurbation around the M25/ M1/ A41 intersections. Being more modern it has wider main roads to take the additional traffic that will result from the additional housing. By contrast, Berkhamsted and Tring are old market towns which are already grid-locked at busy times.</p> <p>With the additional proposed housing being on green belt rather than brown field sites and therefore away from the centres of the towns will stimulate even more car use and exacerbate the problem further.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6188
<b>Person ID</b>	1264867
<b>Full Name</b>	Corinne Fleming
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

<p>* Yes</p> <p>* No</p>	
<p><b>Spatial Strategy for Growth comment</b></p>	<p>The strategy states:</p> <ul style="list-style-type: none"> <li>- The Growth Strategy for Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.</li> <li>- Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites'</li> </ul> <p>The proposed strategy for Tring would clearly detract from the town's character as it will increase the town's population by over 50% in less than 20 years - over development on a huge scale. It will not minimise the development of the green belt as it represents a major reduction of the green belt land around the town and it would also have a detrimental impact on the Chilterns AONB. It therefore represents a complete disregard for the existing character of the town and the landscape.</p> <p>It is not acceptable to increase a town to this extent. It would make more sense to increase the number of additional homes in Hemel Hempstead where an increase would have smaller effect on a larger town. The council could also choose to develop housing on land around the industrial estate or redevelop under used office space so that less prime agricultural land is sacrificed and so that development would have no impact on the AONB.</p> <p>The development recently agreed by Dacorum already in progress in Roman Park in Tring has resulted in a major blight on the view from the AONB. The first houses have been built right on the skyline of the hill to the west of the town, much higher than all the other neighbouring buildings in Tring. This development has not been done with any sensitivity to the green belt, the character of the town or the AONB.</p> <p>Furthermore, information in the press suggests that the projections for Dacorum's housing needs have been based on old data - if this is correct then the projections must be recalculated before any agreement is given to any further loss of green belt.</p>
<p><b>Included files</b></p>	
<p><b>Title</b></p>	<p>Spatial Strategy for Growth</p>
<p><b>ID</b></p>	<p>EGS6199</p>
<p><b>Person ID</b></p>	<p>1261819</p>
<p><b>Full Name</b></p>	<p>Alex Rathmell</p>
<p><b>Organisation Details</b></p>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>• Access to Berkhamsted and Northchurch centres is extremely limited, via a small number of single-track country lanes. Widening these lanes would involve significant habitat destruction as hedgerows and field boundaries are destroyed.</li> <li>• Additional traffic will inevitably use Granville Road as a cut-through to avoid an increasingly congested high street. The road is already used this way, and should be speed limited to 20mph. As this worsens, the danger to children and pets from traffic will increase, and the effects of air pollution (recently cited in court as a cause of death for the first time) will become more serious.</li> <li>• The housing development will place a large green area under concrete. I believe this presents a risk of flooding and ground saturation for the south side of Granville Road, which experiences run-off from the higher ground, as the ground will no longer be able to absorb heavy rainfall. This will worsen as the climate changes and becomes wetter in winter.</li> <li>• In future summer drought conditions, which are certain to increase, the extra demand for water caused by the new development will contribute to depletion of the area's internationally important chalk streams.</li> <li>• The direct pollution caused by the construction of the new developments will be significant, in the form of dust and particulate matter, noise, and emissions from heavy vehicles.</li> <li>• I am concerned that this temporary pollution and the permanent pollution caused by new housing and associated vehicle movements will be concentrated in our valley location.</li> <li>• The habitat destruction that will be caused by the proposed Northchurch developments alone will be devastating. The area around Bell Lane is rich with hedgerow wildlife, including endangered species like hedgehogs and dormice. Similarly, the proposed development along the canal would destroy a habitat for kingfishers (many people walk the canal towpath in Northchurch just to see these beautiful birds - they will not survive the proposed development), herons and numerous other species that value the wet habitat and proximity to the canal. This would also destroy a wildlife corridor that runs along the canal.</li> <li>• Both the proposed Northchurch developments will spoil the enjoyment of the countryside for local people and visitors. In our case, it will push the countryside further away from our children. Walkers on the other side of the valley along the public footpath between Norcott Hill and the B4506 (part of the Ashridge estate) will no longer see a rural view of a relatively undeveloped Chiltern valley, they will see an urban sprawl . Walkers along the canal will find themselves walking first alongside a building site and then yet another housing development, instead of dense vegetation rich in wildlife.</li> </ul>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6281
<b>Person ID</b>	1264884
<b>Full Name</b>	Max Ansell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The strategy for growth does not take into account the 2018 ONS figures which revise the need for housing down to a third of the original figures. There has been much discussion at central government level including the Communities Minister on the reduced need for housing.</p> <p>This is particularly the case in the south east and the original plan for huge growth all around London does not reflect current needs or government strategy. Jobs and government departments are going North in line with the levelling up strategy and that is where the increase in housing is needed.</p> <p>Dacorum needs to revise its growth plans rather than compromise Green Belt land and build more houses than are needed in an area where even 'affordable housing' is beyond the pocket of those in need.</p> <p>Given its distinct identity and size and distance from Berkhamsted amenities and transport Northchurch needs a similar plan to that of large villages such as Kings Langley where limited growth is planned, given its smaller size and rural nature.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6311
<b>Person ID</b>	1263462
<b>Full Name</b>	Bourne End
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The definition of affordable homes is not concrete enough. Specifying quality should be built in to definitions. If the council requires social housing this should be made clear, so that developers know what sort of community they are involved in: the Martindale development (on a former school site) allowed 5 houses for commercial sale, the rest were for social need.</p> <p>Allowing taller blocks in Hemel Hempstead, for example, just increases footfall and needs to be seen in terms of need and sustainability of sites. The criteria for development must always factor in the most up to date assessment especially in terms of environment.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6315
<b>Person ID</b>	1264916
<b>Full Name</b>	Kathryn Spall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I note that 2200 houses are to be built in Berkhamsted and a similar number in Tring - most of which will be on Green Belt land. I object very strongly to Green Belt land being destroyed in order to meet an arbitrary target for housing.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6340
<b>Person ID</b>	1264908

<b>Full Name</b>	Henry Smart
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6342
<b>Person ID</b>	1262933
<b>Full Name</b>	James Cunningham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	This plan is not minimising the use of green belt land. This plan will not maintain the character of Berkhamsted and Tring. I am bemused that this plan suggests there is a need for more retail space!
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6361
<b>Person ID</b>	1264946
<b>Full Name</b>	Shaun Pope

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6379
<b>Person ID</b>	1264928
<b>Full Name</b>	Nicola Simpson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The proposals for Berkhamsted and Tring will ensure that both locations will no longer be market towns but soleless commuter belts with green belts significantly reduced and AONNB destroyed
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6391
<b>Person ID</b>	1264936
<b>Full Name</b>	Jane Cracknell
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	the sites at the top of Swinggate Lane and to the south of upper hall park are not well positioned. They are too far from the town centre and all journeys from these sites will be by car so increasing already heavy traffic in the town. People will not cycle as the hills are too steep and it is too far to walk to the shops and too hilly to carry food etc back. There will be increased traffic and increased need for parking. These sites also form an important leisure facility for local residents and are very regularly used for walking, dog walking , running etc. Green field spaces are environmentally necessary and should be retained. There is limited opportunity for employment in Berkhamsted so new residents will have to commute by car or train into Watford or London.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6396
<b>Person ID</b>	1264964
<b>Full Name</b>	Philip Heaphy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<i>The spatial strategy is based on the erroneous excessive overall target for new housing within Dacorum. As previously commented, the target, once appropriately reduced, can be met through the use of brownfield sites rather than the Green Belt.</i>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS6422
<b>Person ID</b>	1264949
<b>Full Name</b>	Evelyne Brocas
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The government and businesses are moving up North - that is where new jobs are going for the Levelling Up and that is where houses are needed - not the original ring of development around London.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6423
<b>Person ID</b>	1263380
<b>Full Name</b>	Martin Warden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Expansion of Tring to this extent in both dwellings and people cannot be considered as meeting the requirements of sustainability. It will not enhance the sustainability aspects of Tring but will destroy those that it already enjoys.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS6452
<b>Person ID</b>	1264982
<b>Full Name</b>	Rachel Heaphy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<i>The spatial strategy is based on the erroneous excessive overall target for new housing within Dacorum. As previously commented, the target, once appropriately reduced, can be met through the use of brownfield sites rather than the Green Belt.</i>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6473
<b>Person ID</b>	1264971
<b>Full Name</b>	Louise Watson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>The Council has a 2030 net zero commitment. Policy SP5 seeks to grow employment through the borough's close position to the M1 and M25 motorways. This contradicts the council's own net zero commitment as well as the UK's 2050 net zero commitment.</p> <p>— Too much of the housing proposed in Northchurch is at the top of steep hills, far from the train station or employment in Berkhamsted. These sites are therefore highly likely to attract two car families, as journeys to shops, work and doctors'</p>

appointments will require cars. This is not sustainable and does not take account of the responsibility to address climate change.

— The policies do not take into account the impact of the Covid pandemic. 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** Spatial Strategy for Growth

**ID** EGS6513

**Person ID** 1264979

**Full Name** Heather Calder

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** I am concerned by the principle as stated in 5.2 about encouraging substantial increases in heights ... in the most accessible locations. Development in Boxmoor must be sensitive to the local character.

It is hard to see the need for additional retail floorspace when Hemel Hempstead has numerous empty shops.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6533

**Person ID** 1264920

**Full Name** Anna Wellings Purvis

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Hemel Hempstead is on a scale to be a city and it really needs the transport and services and infrastructure to match its population. With more people receiving deliveries there will be more vehicles on the roads after lockdown, and access to the new neighbourhoods does not seem to be adequate. Perhaps a tramway would go a long way towards gaining my support.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6551
<b>Person ID</b>	1264923
<b>Full Name</b>	Ken Douglas
<b>Organisation Details</b>	Secretary TRING IN TRANSITION
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Policy SP2 ‘Spatial Strategy for Growth’, para 3c (Page 31)</b></p> <ul style="list-style-type: none"> <li>‘Tring will accommodate growth of at least 2,700 new homes.’ This is not sustainable, and appears to be in breach of the NPPF definition of ‘sustainable development’. It represents at least a 55% increase in the size of Tring, by far the largest growth in Dacorum. It is well above the evidence-based proportion for Tring based on population growth as amended by Government ‘affordability’ formula (evidenced in the September 2020 SW Herts Local Housing document).</li> </ul> <p><b>Policy SP2 ‘Spatial Strategy for Growth’, section 5.7 (Page 31)</b></p> <ul style="list-style-type: none"> <li>I’m not convinced by this point. The size of a village or town is not necessarily the only factor to be considered in determining how sensitive it is to substantial change. It feels like other areas were not included simply because</li> </ul>

there were not the resources in DBC to properly consider these. IF that is the case then PLEASE....ask for help. We are all in this together, but it doesn't feel that way.

- *'Tring will accommodate growth of at least 2,700 new homes.'* This is simply not sustainable, and likely in breach of the heart of NPPF which is 'sustainable development'. It represents at least a 55% increase in the size of Tring, by far the largest urban growth across Dacorum envisaged by the Plan. It is significantly above the evidence-based proportion for Tring based on population growth through the Plan period as amended by Government 'affordability' formula (evidenced in the September 2020 SW Herts Local Housing document).

In addition, the Plan presents no evidence that development will enhance the town centre or strengthen its function as a key market town in the Borough.

- We are not convinced by this. The size of a village or town is not necessarily the only factor to be considered in determining how sensitive it is to substantial change. If other locations have poorer access and public transport, and/or a general lack of employment opportunities, supporting services or facilities, then arguably these are exactly the places that should see development and improvements.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6556

**Person ID** 1265007

**Full Name** Duncan Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6621
<b>Person ID</b>	1265006
<b>Full Name</b>	Tracy Bownes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The greenbelt impact across Dacorum is stark. 80% of planned Berhamsted development appears to be on greenbelt land.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6652
<b>Person ID</b>	1263500
<b>Full Name</b>	Jessica Haigh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The plans for Tring and Berkhamsted will definitely change them, from Market towns, to an extension of Hemel Hempstead. These are meant to be small towns and do not have the infrastructure to cope with the massive expansion of houses from these developments.

Additionally, spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Government Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt. This is damaging for the climate and the environment around us, something we need to take serious care of.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6654

**Person ID** 1265019

**Full Name** Yvonne Brener

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** This is the wrong time to be doing this, when people are locked up, can't get out to see your plans. You are building all over the green belt and taking away green spaces that have kept people sane.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6686

**Person ID** 1261827

**Full Name** Ian Brener

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	This is an awful way of getting a response from ordinary citizens. The document is over long and unreadable. It is ridiculous and irresponsible that this is happening during such an unprecedented crisis for our country. I can't believe that this is legitimate.  Now all I can say is that I endorse the CCG submission and question your motives at this time.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6690
<b>Person ID</b>	1265055
<b>Full Name</b>	Christine Cowie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I disagree with the Local Plan and the housing numbers proposed.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6749
<b>Person ID</b>	1265036
<b>Full Name</b>	Tom Burrows
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Far too many homes for the areas. Particularlry Tring. 2700 homes?! That is a ridiculous increase for a town the size of Tring! Are you trying to ruin Tring? There is not enough infrastructure for this size development let a lone even a quarter of it.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6775
<b>Person ID</b>	1265033
<b>Full Name</b>	James Heath
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Also for Tring the doctors surgery's are already under pressure. Waiting times for appointments are long and trying to make appointments via telephone can be notoriously difficult.</p> <p>Further developments will again already make a stretched service even more stretched and again mean worse access for the residents. Again not sustainable.</p> <p>Overall the infrastructure and services of Tring cannot cope with these proposals and these developments themselves are not sustainable in their nature.</p> <p>Before any further developments (houses) the current provision of services both doctors and especially schools need improving. If new houses are to be built the schools and other infrastructure must be built first. As we have seen past promises of improved services and job opportunities have not materialised - just look at what was promised at the west side of town originally and what is resulting. I believe additional homes are now being built at the expense of other things.</p>

Overall, I do not support the over development of Tring, which these proposals most certainly do!

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6785

**Person ID** 1265058

**Full Name** Rick Ansell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Northchurch is a sparate village from Berkhamsted. There is no mention of Northchurch in the Strategy for Growth. However Northchurch will be adversely affected. Northchurch is a small village similar to Potten End or Aldbury or Wigginton and should be treated in the same way

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6791

**Person ID** 1265059

**Full Name** Paul Austin

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	There appears to be a drive for Berkhamsted and Tring to support growth in Dacorum, primarily through increased housing, where these are both fundamentally different towns to Hemel. Hemel as a new town has many flaws, and suffers much deprivation, but does offer significant business potential as opposed to berkhamsted and Tring which are small, residential market towns. to suggest that they should do more in delivering Dacorum plan misses the point that Dacorum is a very diverse group of towns. Developing to align with Hemel as opposed to improving Hemel itself is a flawed objective, and gives too little consideration to the green belt and what it was put in place to achieve.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6799
<b>Person ID</b>	1262984
<b>Full Name</b>	Deborah O'Sullivan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>I believe that the plan has over-provision of housing based on inaccurate and superseded data – it is based on out of date ONS data (when there is more recent data available) resulting in a significant over-estimate of Dacorum's housing needs.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6807
<b>Person ID</b>	1265081
<b>Full Name</b>	Caitlin Neale
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Whilst i support the principles in your spacial strategy. I feel that the implementation of it is flawed and in some parts using incorect and outdate models/data
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6809
<b>Person ID</b>	1265072
<b>Full Name</b>	Peter Barker
<b>Organisation Details</b>	Me
<b>Agent ID</b>	1264829
<b>Agent Name</b>	Peter Barker
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	In Berkhamsted this is all concentrated in predominantly one area. It will significantly increase congestion in an already congested high street. I would say Berkhamsted is relatively constrained in infrastructure also.  You are supposed to need 'exceptional circumstances' to justify building on Green Belt. It's there to stop urban spread. There is not evidence of 'exceptional circumstances' here.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6849
<b>Person ID</b>	1265063

<b>Full Name</b>	Richard Scott
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Your proposal includes the building of housing - 64% of which will be on the Green Belt (77% on Greenfield), including 2,200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from the Governmnets Standard Methodology as a strict housing target. There are numerous examples of where the Government state that it is not a TARGET). This has lead to a growth Strategy and plan at unsustainable levels and locations at the cost of swathes of the Green Belt. The reference to Berkhamsted and Tring providing more balance to the growth is ridiculous given the small high-street and the green-belt that woul dhave to be sacrificed to deliver this plan.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6909
<b>Person ID</b>	1265074
<b>Full Name</b>	Stephen Wilson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am totally against this policy. The target for houses is way above that needed to assist the current numbers of people in dacorum who need somewhere to live. I believe that it will simply mean more houses for relatively well off people moving out of London, who will then commute back into London

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6925
<b>Person ID</b>	1265105
<b>Full Name</b>	Jonathan Tay
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	Town such as Hemel Hempstead, Berkhamsted and Tring cannot not grow sustainably. Take for instance train travel to London - the trains are standing room only from Berkhamsted at peak times already - adding thousands of new homes will only increase that congestion, it is unlikely people living in Hemel will be able to board most peak trains.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS6963
<b>Person ID</b>	1263118
<b>Full Name</b>	Piquita Robinson-Lobbett
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	5.6 Because public transport is poorer in the smaller villages this is a reason to not develop them?

Surely to continually develop exiting towns only is unfair and unbalanced as they get bigger you use this as justification to keep making them bigger. surely a balance way of planning wouod be to considering improving services and facilities in places where this is not currently available would be fairer. This would stop reduce the requirement for peopple to travel into already congested town centres.

So much has changed during 2020 is they way of thinking and planning still valid?

Tring station car park was full by 7am in the morning and the mid evening bus sparodic will this be improved, or is it now being assumed that everyone will be working from home?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS6966

**Person ID** 1265116

**Full Name** andrew Koutsou

**Organisation Details** Me - resident

**Agent ID** 1265101

**Agent Name** andrew  
koutsou

**Agent Organisation**

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

**Spatial Strategy for Growth comment** The demands of tring are very high indeed , 2700 when compared to 2,200 in berkhamstead. This is supposed to be a small town not a city! No resident in tring thinks this will enhance the town centre - they think in fact it will be overcrowded, there will be a strain on services, there will be increased traffic. no places to park and most importantly the identity and atmosphere of the town centre will be lost and changed for the worse. Residents want this to remain a small town, not a place where you dump an unfair amount of your housing allocation. This is a historic town with its own character and you are going to trample it.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7012

<b>Person ID</b>	1262099
<b>Full Name</b>	Chris Taylor
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on the new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.</p> <p>We cannot sit back and allow our greenbelt to be swallowed up for the sake of profit.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7019
<b>Person ID</b>	1265039
<b>Full Name</b>	Michael Lelieveld
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am wholly against the following stated strategic principle in the Local Plan (Section 5.2): 'Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel

Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations.'

The intention to 'accomodate growth of at least 2,200 homes' is a 25% increase for Berkhamsted which will irreversibly change the character of the town. Berkhamsted will no longer feel like a unique and peaceful market town on the edge of the countryside but will head towards feeling like any other highly populated bustling large and highly urbanised town in the South East. It will no longer be such a pleasant and attractive place to live. Furthermore, sacrificing so much Green Belt to achieve the target is criminal - especially when Berkhamsted is surrounded by AONB.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7037

**Person ID** 1263561

**Full Name** Alexander Bhinder

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Too late to elaborate.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7073

**Person ID** 1265088

**Full Name** catherine Hay

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Northchurch is a village in its own right, yet it seems to be lost in the plan as though it is simply an extension of Berkhamsted.</p> <p>There is no interest in the character and nature of Northchurch it isn't even acknowledged</p> <p>Any thing post Covid 19 needs its own development strategy , life, business and spatial growth will be very different now. this will be an unreflective plan. and as mentioned in previous comments, we know that the housing demand figures are wrong.</p> <p>DBC are also misleading the public by stating the targets as absolutely necessary, yet the government doesn't actually state this,</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7074
<b>Person ID</b>	1265133
<b>Full Name</b>	Sarah Storey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	Please see previous comments. The proposed development in Tring in particular is unjustified and disproportionate.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7085
<b>Person ID</b>	1265129

<b>Full Name</b>	Karen Foxwell-Moss
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>DBC has incorrectly taken the housing numbers from Government's Standard Methodology as a strict housing target despite the fact that there are many instances where the government has made clear that these are not targets. This has led to a growth strategy focused around unsustainable locations at the cost of swathes of Green Belt land. Once repurposed, this land will never go back to being green field/ Green Belt land and these much treasured bastions of the countryside will be lost forever.</p> <p>Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7103
<b>Person ID</b>	1265127
<b>Full Name</b>	Jason Foxwell-Moss
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The number of houses and the plan to build on green belt land seems to be justified by DBC using faulty government methodology to calculate the numbers required, and the strategy being an edict rather than a recommendation.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7171
<b>Person ID</b>	1261685
<b>Full Name</b>	Ian Edwards
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The growth proposed for Tring is completely disproportional to the existing population, compared to other towns. And with Tring being an historic market town, there is little ability for the town to cater for something like a 50% increase in population and road users. Traffic flow is chaotic at times already. I can't possibly imagine the High Street, or Brook Street, for example with a 50% increased capacity!</p> <p>The proposal is completely counter intuitive to the strategy of 'Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites'. That's exactly what the proposal for Tring does!</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7219
<b>Person ID</b>	1264956
<b>Full Name</b>	Caroline Heard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt..
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7236
<b>Person ID</b>	1265168
<b>Full Name</b>	Jo Slade
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	My main focus in answering this relates to Tring as this is the area I am most familiar with. The plan states that ' <i>Tring will accommodate growth of at least 2,700 new homes.</i> ' This is simply not sustainable, and likely in breach of the heart of NPPF which is 'sustainable development'. It represents at least a 55% increase in the size of Tring, by far the largest urban growth across Dacorum envisaged by the Plan. It is significantly above the evidence-based proportion for Tring based on population growth through the Plan period as amended by Government 'affordability' formula (evidenced in the September 2020 SW Herts Local Housing document). In addition, the Plan presents no evidence that development will enhance the town centre or strengthen its function as a key market town in the Borough.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7255
<b>Person ID</b>	1265027

<b>Full Name</b>	Saba Poursaeedi
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	For Hemel Hempstead to grow by over 10,600 new homes will put horrendous strain on the roads and infrastrcuture. If average wages are £34,000 and houses are £450,000 average it doesn't take a genous to know most people working in Hemel will live in cheaper areas and most people who can afford to live here will have to work closer to London. Commuter choas will be the reality after these plans are fulfilled.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7270
<b>Person ID</b>	1264957
<b>Full Name</b>	Mike Connell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	I do not believe current proposals adequately protect the green belt. Brownfield sites have not been considered sufficiently. having lived in the borough for 35 years, I consider that there are numerous areas which should be redeveloped before using excessive green belt.  I believe that the requirement for new homes is out of date being based on old statistics and new statistics do not support this level

I am particularly concerned that plans will be seriously detrimental to the roads in the area of Water End which has recently seen some improvement from the new weight limit

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7282

**Person ID** 1265175

**Full Name** Sherief Hassan

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** The level of development is not reflected in the Governments own figure that has yet to be ratified in forcoming legislation. Before any decisions are made, the new legislation should be paramount in a redraft.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7288

**Person ID** 1265179

**Full Name** JANE DAWSON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

## Spatial Strategy for Growth comment

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7327

**Person ID** 864107

**Full Name** Mr Antony Hetherington

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

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The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development

rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7338

**Person ID** 1207259

**Full Name** Mr Graham Bright

**Organisation Details** Chairman  
Grove Fields Resident Association

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area. It is only after consideration of the

level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

Reference the Sustainable Transport Strategy for Tring

Page 72 - "Due to COVID-19 lockdown restrictions, on-site observations for the challenge audits have been replaced by desktop checks using on-line tools. A series of Google Streetview photography images are presented in this chapter which were obtained during the audits." This is not a robust enough assessment to determine the transport challenges that a 55% growth in houses, people and cars will provide to the town of Tring, without an on the ground assessment the local plan is not ready for consultation.

Page 114 - "The evidence analysis and challenge audits along the interactions identified a range of potential issues affecting how the transport network is used in Tring. It would not be feasible or cost effective to address all the issues identified. Some characteristics of the town, most notably its more historic and physically constrained network of roads in the centre of the town

and the remoteness of the railway station, will continue to create barriers for people making trips on foot or by bike as there may be fewer opportunities to introduce high-quality interventions." Without an assessment of impact of not being able to deliver high quality interventions the local plan is not ready for consultation.

Page 114 - "The proposed Local Plan developments on the edges of the town (TR02 and TR03) in the case of East of Tring will pose a significant challenge in encouraging sustainable travel behaviour." Without an assessment of impact of not being able to change travel behaviour the local plan is not ready for consultation.

Page 114 - "A wider range of measures had been considered however in some cases it has been determined that there is insufficient space within the highway boundary to provide an acceptable solution, or there are safety concerns which would be too difficult to overcome." Without an assessment of impact of not being able to deliver acceptable solutions the local plan is not ready for consultation.

Page 146 - "The Sustainable Transport Study deliberately avoids putting forward large-scale, expensive and complex infrastructure such as new road links and junctions, and major new public transport routes. The evidence which has been used to inform the development of this study, including the County Council's transport model COMET, does not indicate that there is a requirement for." I strongly object to the assumption that a 55% increase in homes, people and cars can be accommodated through only the introduction of cycle paths and pedestrian crossings. A more robust and independent assessment of the road infrastructure requirements for Tring is required to avoid the town becoming gridlocked. Without a more robust transport assessment the local plan is not ready for consultation.

Page 146 - "The nature of funding infrastructure is uncertain." Do we have a commitment from Hertfordshire CC and Dacorum Borough Council that the sustainable transport initiatives suggested in this report will be fully funded by them where developer contributions are not sufficient to privately fund the initiatives? Without a commitment to fund the infrastructure the local plan is not ready for consultation.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7376

**Person ID** 1265366

**Full Name** DR F W STUBBS

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I have read, and support, the comments made in response to this plan by Nettleden and Potten End Parish Council and by the CPRE.</p> <p>My particular concerns are that the plan -</p> <ol style="list-style-type: none"> <li>1 appears to be based on outdated data and is therefore unlikely to be appropriate at the present time.</li> <li>2 will result in greatly increased traffic through already congested Berkhamsted and through Potten End with its school situated on the cross roads in the centre.</li> <li>3 will have a detrimental effect on the Green Belt.</li> <li>4 will put increased pressure on the water supply from the already over extracted chalk streams.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7386
<b>Person ID</b>	1265372
<b>Full Name</b>	BRIDGET WILKINS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Please this is so important to life on the earth and related to climate change. Do not build houses on Green Belt. Trees and nature are desperately important. Have you not heard David Attenborough talk about this?</p> <p>It's now or never. How can you be so uninformed?</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7387
<b>Person ID</b>	1265373
<b>Full Name</b>	ANDREW FAIRBROTHER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I wish to make an objection to the proposed building of 2,700 homes on green belt land around Berkhamsted that was in the news recently.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7404
<b>Person ID</b>	1265377
<b>Full Name</b>	PHILIP MOORES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in

planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. **At** Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring

to an existing infrastructure already stressed. Furthermore the lack of a clear plan for future infrastructure to support the development in Tring is a serious oversight in the Local Plan.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7418

**Person ID** 1265380

**Full Name** JON WRIGHT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of

further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

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Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title**

Spatial Strategy for Growth

<b>ID</b>	EGS7430
<b>Person ID</b>	1265381
<b>Full Name</b>	DR SUE DAVEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7442
<b>Person ID</b>	1265383
<b>Full Name</b>	RUTH NEWCOMBE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
<b>* Yes</b>	

* No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to the proposal of some 3400 new homes to be built around the small peaceful village of Long Marston.</p> <p>Having been a resident of Long Marston for over 17 years now I have seen an increase of traffic trough our village that the road system simply can't cope with.</p> <p>The roads are constantly peppered with potholes from large lorries that the roads cannot take and the speed at which traffic travels through is simply not safe.</p> <p>I live on the cross roads opposite the pub and the amount of cars abusing the long straight roads in and out of the village is rediculous.</p> <p>The roads in and out of the village can hardly cope with the lorries coming through on a daily basis up to the airfield, there is categorically no capacity for any more, which a development of this size would bring in spades.</p> <p>I have seen the village flood numerous times, how can it cope with another 3400 homes??</p> <p>The school is not big enough to accommodate more children and the parking at school run times is already mad enough.</p> <p>The village has one small pub, and no other facilities. The church would not be able to cope with extra people either.</p> <p>The village would be irreversibly changed for the worse, ultimately turning it in to a town.</p> <p>There simply isn't enough in the area to cope with such a huge development.</p> <p>It would inevitably devalue all the properties in the village too.</p> <p>I urge you to consider the lives of the residents of Long Marston and think how it would affect you if this was proposed on your doorstep.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7449

<b>Person ID</b>	1145699
<b>Full Name</b>	Mr Paul Walker
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I would like to voice my oppositions and concerns on the current 'Emerging Strategy for Growth 2020 - 2038'. This is based on a number of objections that will have a personal impact on my family, me and my community.</p> <p>Firstly we moved to area because it is in an area of outstanding natural beauty (protected green belt land). We have brought our children up with knowledge of the local countryside and we walk, run and explore the area local to us every day. This proposed development will impact our daily lives greatly and I am concerned for the mental well-being of my family and some of our more elderly community. During this horrible pandemic we've been restricted in our attempts to care for a number of individuals and I'm acutely aware that several are in the dark to the extent of the impact on the local area, environment and their daily life.</p> <p><b>Destroying the feel and way of life for my local community</b></p> <p>Community is something that I feel very strongly about and something that Berkhamsted and Tring currently prides itself on.</p> <p>Recent mass developments in both Aylesbury and Hemel Hempstead is already threatening to swallow up both Tring and Berkhamsted market towns in to mass suburbia.</p> <p>The proposed growth strategy will completely change the community feel of these market towns that I want my family to grow up in.</p> <p>In the light of recent events (Brexit and CoronaVirus) 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 <b>way</b>.</p> <p>I'm aware that in December 2020 several MP's were successful in shifting the housebuilding emphasis to brownfield urban sites in the West Midlands and northern England, away from rural and semi-rural communities in the South East.</p> <p>In October 2020, former Prime Minister Theresa May called the plans "ill-conceived", while ex Foreign Secretary Jeremy Hunt accused the government of risking "undermining" local democracy by pressing ahead. Therefore, I'm aghast that these plans are still under consultation.</p>

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7484

**Person ID** 1265553

**Full Name** BARBARA BYRNE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I wish to object to the draft local plan which is based on inaccurate and out of date population projections.  
I am sure some additional housing is needed next decade but not the vast amount that is projected for Berkhamsted and Tring. The housing proposed will totally change the historic character of the area.  
I would also say the majority housing proposed 4/5 bed homes is not what is needed. What is needed is more social rent housing and 2 and 3 bed family homes.  
  
I do not think the case for using green belt land for housing is well made. Again this seems a weak giving into large housing developers who know they can make more money for greenfield sites.  
There is weak or no planning for the necessary infrastructure to support the massive and unnecessary increase in housing in the plan. There is also no employment strategy so the additional housing provision will need employment elsewhere  
.  
In terms of the need to plan for net zero carbon I do not think this draft plan supports it in anyway.  
Finally the impact of the pandemic may well impact on the need for development in London and the south east so it may be tie. To take a step back wait for the outcome of the census this year and base plans on more realistic projections.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7490
<b>Person ID</b>	1265558
<b>Full Name</b>	CLAIRE AND GORDON HEWITT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We strongly disagree with the plan for the type and number of additional houses in Berkhamsted and Tring. Although we accept the need for the provision of new properties, the plan is misconceived as a significant amount of green belt will be lost plus the fact that it will put a considerable strain on the current and future planned infrastructure.</p> <p>It appears that the volume of houses proposed in the Berkhamsted and Tring area is disproportionate to the number of new homes in the whole of Dacorum. This proposal needs revisiting in order to get the support of the local community.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7547
<b>Person ID</b>	1261622
<b>Full Name</b>	Marc Gloder
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>I watched last night debate with Cllr. Lara Pringle and was also made aware last week of a proposed development near Bourne End that would see 800 and 1100 new houses built in 2 separate but very close developments. Looking at the proposed sites, I am horrified at the amount of the Green Belt that would cease to exist. You can't just get rid of it and plonk nearly 2000 houses in its stead: this is national heritage, national property and as an elected person, you should insure that land is protected, not sold so developers can fill up their pockets ! I am not into politics: I am not Tory or Labour, let alone Lib Dem but I can see who's working for the best outcome for the people and who isn't. I am appealing to you as a citizen of Hertfordshire.</p> <p>I left Harrow where I lived for 27 years and came here because the quality of life seemed much better. Even living next to Bourne End Mills Industrial Estate didn't bother me compared to how Harrow had developed. I saw the upheaval created by the development of the Eastman Kodak factory (The Eastman Village) where 2000 new homes were built and it's not something I'd wish on my worst enemy. Despite all the precautions you may take, all the facilities you may offer, it will never go smoothly, it will the end up in disappointment and bitterness.</p> <p>Please, do not do this to Dacorum: I understand people need homes but there are plenty places that won't need councils to destroy a massive part of the Green Belt. Do not turn Herts into a place where nature consists of small manufactured greens with plastic cows. If not for our sake then do it for our grandchildren's future.</p> <p>Thank you for your time.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7554
<b>Person ID</b>	1265594
<b>Full Name</b>	Ms Margaret Elwick
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>Spatial Strategy for Growth comment</b>	As a resident of (address removed) I am concerned at the development proposals that are being put forward. I appreciate that we need more housing & I have taken part in planning workshops in the past. My concern at the moment is that people need to be able to attend meetings & see the proposals in reality rather than trying to view everything online. I would ask that you consider extending the consultation process so that when we emerge from lockdown we are able to engage properly with the process as it is so important.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7561
<b>Person ID</b>	1265596
<b>Full Name</b>	Mr David Seymour
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am most concerned about the future planning for the Dacorum area, which has been outlined in the Dacorum Local Plan.</p> <p>The plan specifies an excessive number of houses for the designated individual areas. In addition there will need to be an increase of building for the creation of extra local services.</p> <p>The proposals would include a significant population increase. Can the Borough support this?</p> <p>There is a further loss of Green Belt areas which should not be permitted. We have already lost significant 'green' areas. Since the Covid lockdown, it is likely that all local planning will need significant reconsideration. I urge you to consider this.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7577
<b>Person ID</b>	1265614
<b>Full Name</b>	JACKIE BARKER

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify</p>

development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7593

**Person ID** 1265618

**Full Name** RACHEL WOODS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**Spatial Strategy for Growth comment**

In response to the draft local plan entitled 'Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation', I would like to register my objections as follows:

The proposals to build on the green belt contradict government guidelines which state that there needs to be strong proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown.

The housing projections are based on out-of-date and non-area-specific statistics.

There has not been enough scrutiny of potential brown field sites for development, thereby avoiding impact on Green Belt land. Research has shown that Covid 19 has changed behaviour meaning more town centre development is possible, but this has not been taken into account.

There are too many houses, yet no evidence in the plan that there will be enough social and affordable housing. We need to be building the right houses in the right places for local people - not supporting developers to create expensive housing that will benefit them.

Not enough care has been taken to protect the local ecology - the demand for water with this increased housing will damage the aquifer and the internationally recognised chalk streams.

The plans are not carbon neutral and conflict with commitments to tackle climate change.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7600

**Person ID** 1265734

**Full Name** Ian Gent

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Spatial Strategy for Growth comment</b>	<p>I wish to record my concerns/opposition to the proposed Draft Local Plan 2020-2038</p> <p>I am extremely concerned about the proposals made in the proposed Draft Local Plan.</p> <p>Whilst I appreciate that new homes have to be built to meet the housing demand.</p> <p>The proposals included in this plan are in my opinion are excessive.</p> <p>My main concern is that too much of the Green Belt will be lost to accommodate this excessively high number of new homes. This will change the character of the area, especially Berkhamsted and Tring.</p> <p>The proposed increase in housing will greatly increase the area's population and consequently increase the pressure on an already strained health service. Doctors, Dentists and Hospitals.</p> <p>I am also concerned that the services industry providing the electricity, gas, water and sewerage systems will not be able to cope with the housing numbers proposed in the plan.</p> <p>I have lived in Berkhamsted all my life and am now 65 years old. I have seen Berkhamsted and the surrounding area change dramatically during my lifetime and not all of the changes have been to the benefit of the area, which is a great shame.</p> <p>I fully support the views of the Berkhamsted Citizens Association and the Berkhamsted Residents Action Group in their opposition to the proposed Draft Local Plan 2020-2038.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7604
<b>Person ID</b>	1143218
<b>Full Name</b>	Mr Terry Cartmell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations</p>

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

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have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

The plan fails to take into account the ongoing and future effects of the Covid pandemic in terms of peoples' working habits i.e. the number of people working from home and not having the necessity for easy access to railway transport facilities and also the current demise of high street retail facilities which altogether is likely to result in large amounts of town centre retail and office accommodation which could be repurposed for housing oviating the need for encroachment on the green belt. The plan is clearly out of date.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7609

**Person ID** 1265141

**Full Name** Alison Reid-Davies

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** I fully endorse the response of the Chiltern Countryside Group.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7627

**Person ID** 1265744

<b>Full Name</b>	JOANNE MENNIE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Whilst I support the need to increase housing, this needs to be done in a sustainable way and to preserve the greenbelt. The plans to increase housing in the area by 16,600 new homes is completely excessive to what the projected need is. The latest ONS data available projects 6051 new homes by 2038 - 64% fewer than this plan projects. I therefore object to the proposed plans and would like this email put forward to the decisions board.</p> <p>There is already a high demand for services such as traffic needs, schools and healthcare in the Dacorum area. The plan does not commit to any level of sustainability in its sustainability targets.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7637
<b>Person ID</b>	1265748
<b>Full Name</b>	Mr Roger McVey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

## Spatial Strategy for Growth comment

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.

Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development

rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7649

**Person ID** 1265753

**Full Name** JANE CRESSWELL

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

- I object to the proposals in the consultation because the proposals to build on the green belt are wrong.
- I understand that there needs to be proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown:
  - The housing projections are based on out-of-date statistics
  - The needs of local people have not been prioritised over the needs of developers
  - There has not been enough scrutiny of brown field sites
  - CV19 has changed behaviour meaning more town centre development is possible - this has not been taken into account
  - There are too many houses, yet not enough social and affordable housing - we should be building the right houses in the right places for local people - not giving a green light to urban sprawl
  - Not enough care has been taken to protect the local ecology - the demand for water will damage the aquifer and the internationally recognised chalk streams
  - The plans are not carbon neutral and conflict with commitments to tackle climate change
  - The houses proposed will encourage people to use cars as they are not near employment or transport hubs.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7651
<b>Person ID</b>	1265752
<b>Full Name</b>	Mrs Flora Moores
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify</p>

development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7670

**Person ID** 1261784

**Full Name** Nigel Vanner

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council’s inner settlement plans and their assessment of housing needs.

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7696
<b>Person ID</b>	1265614
<b>Full Name</b>	JACKIE BARKER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify</p>

development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7704

**Person ID** 1145385

**Full Name** Mr John Ebdon

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

You are going to ruin our area!

Unable to complete form as are many other residents but needed you to know that we do not want a concrete jungle to live in with the usual lack of infrastructure and forethought!

To accept the proposals would be lunacy on your part!

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7710
<b>Person ID</b>	1265765
<b>Full Name</b>	Miss Inma Rodriguez
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7732
<b>Person ID</b>	1265776
<b>Full Name</b>	Anne Oldfield
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Lastly, the necessity to build 16899 houses across Dacorum is not justified by the latest statistics in population growth.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7766
<b>Person ID</b>	1146111
<b>Full Name</b>	Mrs Catherine Salmon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	There are many reasons why I object to the Dacorum Local Plan, not least because of its destruction of our vitally important Green Belt and the lack of infrastructure to support it, but I think the number of proposed developments across Dacorum is excessive and I question the formula used to calculate it.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7771
<b>Person ID</b>	1265891
<b>Full Name</b>	james arnold
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I acknowledge that more homes are needed nationally but greenbelt land should not and does not need to be used to provide the additional homes required. There are many brownfield sites across the UK desperate for regeneration and

there are signs (post Covid) that we will have a lot of office space standing empty creating additional opportunities for more affordable accommodation. Further exploration of the location of these sites should be carried out – and developed first.

Let's not kid ourselves that this process is going to create affordable housing. Developers on land around Berkhamsted because of the large prices which executive homes can attract. They are not interested in meeting the accommodation and services needs of the local community.

The Plan in Dacorum takes the easy way out – focussing on simply taking up large swathes of green belt land without looking further and differently. The numbers are simply unrealistic and Dacorum should push back on the housing targets, concentrating more and more homes in the South East is simply not sustainable and does nothing to help investment in the UK as a whole. What is more, increasingly there is less reliance on needing to be close to London.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7782

**Person ID** 1263819

**Full Name** Naomi Scott

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I wanted to add my name to the list of local residents who are against the local plan. I agree we need to build additional housing and the part of the plan that covers development of existing run down, derelict, disused buildings and areas will be of great benefit to the local area, but I whole heartedly reject building mass housing sites on fields and green belt. The amount of homes planned seems completely disproportionate to the area and such a massive increase it can only negatively impact the town. Main roads running into Hemel including the London Road, and St Albans road are already often jammed with traffic at peak times, we are losing our hospital, we do not have enough doctors surgeries or NHS dentists already to support the local area. The town car parks are often already full at weekends, and the station car park (while I understand has plans for expansion is also impossible to park in if using during the day).

I welcome regeneration and exciting about the majority of planned sites and changes to the town moving forward, it's just the green belt land and fields that I reject.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7794
<b>Person ID</b>	1148738
<b>Full Name</b>	Ian and Claire Field
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted, of which 80% will be on new Green Belt releases, and 150 at Grange Farm in Bovingdon which would cause further residential sprawl of the village away from it's "village roots" around the High Street and out towards Ley Hill. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7810
<b>Person ID</b>	1265909
<b>Full Name</b>	Peter Evans
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>The plan for Tring to have at least 2700 new homes is not sustainable. As above ,the 55% increase in the size of Tring is by far the largest within the plan for Dacorum and is likely to impact greatly on wildlife and biodiversity by destruction of hedgerows and other habitats, wildlife corridors and by the increase in population, cars, and pollution. The plan to create new spaces for wildlife conservation and nature reserves is completely contra to the loss of widespread open countryside and land which contributes to the AONB and Green Belt land.</p> <p>We are in a climate emergency. I strongly believe that the plans should require builders to use low carbon schemes and renewable energy. The words used in the plan are to ‘encourage’ and ‘stand along’ these aims. As economics will always be the driver for development companies, these need to be mandated not ‘encouraged’ to ensure that they are used.</p> <p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7822
<b>Person ID</b>	1265909
<b>Full Name</b>	Peter Evans
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

## Spatial Strategy for Growth 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. I agree with the Grove Fields Residents Association responses to the local plan in relation to the following:

- Housing need must be calculated through an objectively assessed needs assessment.
- Reverting to a strategy based on Hemel Hempstead taking on the vast majority of housing (following objective assessment of need) would provide the appropriate socioeconomic and physical infrastructure for development. It would allow greater opportunity for using brownfield sites and reduce the cumulative effects on the Green Belt and AONB's.

I agree with the Tring in Transition group in their proposals below:

### 'On Dis'nc've Developments and Vision for the Future

The need for 'disAncAve' development is menAoned several Ames in connecAon both with the natural and built environments (e.g., 'All seClements will have retained their separate and disAncAve idenAAes 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 disAncAve seClement in Dacorum in terms of natural seQng, social and economic history. Neither is it clear how this will be given 'teeth' in order to proacAvely 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 definiAon, Tring in TransiAon has created an iniAal descripAon of what makes Tring disAncAve to help shape what we would expect to see in the final version of the Plan. This highlights our unique heritage and locaAon, including:

- A Rothschild legacy of forward-thinking development, respect for the environment, bold and challenging designs and soluAons.
- A strong heritage of local renewable energy with significant wind and waterpower.
- A locaAon 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 tradiAonal desAnaAon locaAon to visit, meet, relax and socialise.

### 2. '21st Century Market Town'

To address the need for growth, enhance the exisAng town centre and correct assumpAons apparently carried over from previous planning exercises (traceable back to the 1990s).

We proposed taking a lead from exisAng '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 'desirable' 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 from the High Street, encouraging food, social and 'desirable' spaces.
- Recognise that Dunsley Farm is better suited to residential home development than light industry – meeting both social and employment needs.

### 3. '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.)

### 4. '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** Spatial Strategy for Growth

**ID** EGS7831

**Person ID** 1265915

**Full Name** Mr Stephen Trueman

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemet Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7864
<b>Person ID</b>	1265975
<b>Full Name</b>	Clare Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7893
<b>Person ID</b>	1265988
<b>Full Name</b>	TONY WILKS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am in strong disagreement with the plan for the type and number of additional houses in Berkhamsted and Tring. Although I do accept the need for the provision of new properties, the plan is misconceived as a significant amount of green belt will be lost plus the fact that it will put a considerable strain on the current and future planned infrastructure. It appears that the volume of houses proposed in the Berkhamsted and Tring area is disproportionate to the number of new homes in the whole of Dacorum. This proposal needs revisiting in order to get the support of the local community.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7901
<b>Person ID</b>	1265991
<b>Full Name</b>	NICHOLAS MORGAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7914
<b>Person ID</b>	224149
<b>Full Name</b>	Mrs Victoria Pudney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I object to this plan on the basis of the unreasonable % increase in housing on the towns of Berkhamsted and Tring. It is too much of an increase in dwellings with insufficient additional infrastructure planned. Doctors abs schools are already struggling and unable to cope with immediate local demand.

Furthermore, It would also caused irreversible change to the character of these market towns and the green belt space around them. The impact to wildlife of this plan is not acceptable. Building on brownfield sites should be prioritised before green belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7915

**Person ID** 1265994

**Full Name** R KIRBY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** 16,000 homes in the area cannot currently be supported with local infrastructure. Booking a doctor's appointment at my local practice typically involves waiting a month to be seen, local schools are already heavily oversubscribed and traffic/parking already at its peak in most areas. We have recently applied to infant schools in the area, with those within anywhere close to walking distance having 2-3 applicants per place already. When it comes to secondary schools, children in previous years have been sent to Westfield in West Watford - where are these potentially thousands more kids meant to be educated?  
Up to date figures should be used to greatly reduce the housing figures.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS7922

**Person ID** 1262335

**Full Name** Penelope Harrison

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock. 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 simplistic algorithm. 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 than this plan projects. 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).
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7924
<b>Person ID</b>	1262335
<b>Full Name</b>	Penelope Harrison
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I Call for: • The number of new houses proposed in the plan to be substantially reduced.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS7935
<b>Person ID</b>	1265997
<b>Full Name</b>	ROSE SHERIDAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity for future generations. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7953
<b>Person ID</b>	1266002
<b>Full Name</b>	ROXANNE RANSLEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Too much growth particularly around Tring. Need not considered, in line with gov guidelines.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7961
<b>Person ID</b>	1145338
<b>Full Name</b>	Mr David Zerny
<b>Organisation Details</b>	Chandlers Cross Residents Association
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I wish to comment on behalf of Chandlers Cross Residents Association (CCRA), as a committee member.</p> <p>My comments are as follows:</p> <p>The housing figures are nonsensical, and need to be challenged.</p> <p>The Plan is based on a flawed methodology which contravenes the NPPF; would mean massive damage to our environment through the loss of Green Belt, at a time when the Climate Emergency we face is becoming widely acknowledged; and be against the best interests both of Dacorum residents and those living in surrounding areas, by putting even greater strain on an already over- stretched infrastructure.</p> <p>Dacorum BC needs to represent the views and needs of its residents- as councillors are elected to do- by pushing back against an arbitrary, unfair and undeliverable Government housing target.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7962
<b>Person ID</b>	484190
<b>Full Name</b>	Mrs Elizabeth Stanton-Kipping
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I would just like to say that I am very nervous about the quantity of houses to be built as the infrastructure for doctors schools, etc just hasn't seemed to have been thought about. Because of this, I cannot agree with it.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7966
<b>Person ID</b>	1266006
<b>Full Name</b>	SUE ELLERAY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	2/ Do you have any specific comments about the sustainable development strategy? —The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements. — This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan. — Northchurch has not been recognised at all. It has been called West Berkhamsted instead. — The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology. — There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7968
<b>Person ID</b>	1266006
<b>Full Name</b>	SUE ELLERAY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7983
<b>Person ID</b>	1266012
<b>Full Name</b>	SIMON EDWARDS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>In response to the draft local plan entitled 'Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation' I would like to register my objections as follows:</p> <ul style="list-style-type: none"> <li>— I object to the proposals in the consultation because the proposals to build on the green belt are wrong.</li> <li>— I understand that there needs to be proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown: <ul style="list-style-type: none"> <li>— The housing projections are based on out-of-date statistics</li> <li>— The needs of local people have not been prioritised over the needs of developers</li> <li>— There has not been enough scrutiny of brown field sites</li> <li>— CV19 has changed behaviour meaning more town centre development is possible - this has not been taken into account</li> <li>— There are too many houses, yet not enough social and affordable housing - we should be building the right houses in the right places for local people - not giving a green light to urban sprawl</li> <li>— Not enough care has been taken to protect the local ecology - the demand for water will damage the aquifer and the internationally recognised chalk streams</li> <li>— The plans are not carbon neutral and conflict with commitments to tackle climate change</li> <li>— The houses proposed will encourage people to use cars as they are not near employment or transport hubs.</li> <li>— The increased populations in Tring and Berkhamsted will mean more traffic travelling along Northchurch High Street, leading to congestion, increased pollution, health problems, road safety concerns</li> <li>— this will be bad for the mental and physical health of our residents and future generations.</li> </ul> </li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS7990
<b>Person ID</b>	1266015
<b>Full Name</b>	SOPHIE WHITTON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	a) The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements. This is particularly apparent in the approach to the historic village of Northchurch, which has not

been acknowledged in this plan. Northchurch has not been recognised at all. It has been called West Berkhamsted instead. As a resident of Northchurch who chose to live here due to its distinct character, I find this very galling.

b) The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology. I agree with fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8003

**Person ID** 1266017

**Full Name** LOUISE WALDRAM

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth 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.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8009
<b>Person ID</b>	1266022
<b>Full Name</b>	MARY SHIELS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing with regards to the development of Dacorum housing currently in consultation, which I was completely unaware of until Friday 26th February at which point I found out it is only in consultation until today, Sunday 28th February. In addition most people I have spoken to were also unaware. I have not received any information which I believe was supposed to come through residents doors.</p> <p>I object to the proposed plans and would like this email put forward to the decisions board. Whilst I recognise the need to increase housing, there also has to be a balance to preserve the green belt space. The plans do not seem to match the requirements and are indeed excessive. Moreover there is already a high demand for services such as schools and healthcare in our area however no commitment as to how this is going to be managed with the increasing pressure the proposed volume of new houses would bring.</p> <p>With a significant volume of people being unaware of such proposals, I feel this urgently needs reconsideration.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8014
<b>Person ID</b>	1266025
<b>Full Name</b>	PAULA GREENAWAY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I would like to raise my objections to the ritual stripping of our open spaces and green belt. Has this past year not been a wake up call for us all about the need for space. There should be enough brown field sites available to more than cater for your needs. All our beautiful villages are being eradicated by the wanton disregard for people and for our wildlife .No a new wildlife area incorporated in a housing development is not adequate
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8017
<b>Person ID</b>	1159238
<b>Full Name</b>	Mrs Rosemary Finn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	With reference to the above local plan, I am writing to complain about the proposed overall loss of Green Belt and trees throughout the Dacorum area, but in particular Kings Langley. The Dacorum plan consists of the loss of 850 hectares of Green Belt land. The proposal is for the development of 16,899 properties. This figure is wrongly based on outdated data from 2014. If more up to date data were to be used, this figure would reduce by half i.e. a figure of 8,000! The choice of development on protected Green Belt, contravenes the policy that land can only be removed from Green Belt, in exceptional circumstances. There are no exceptional circumstances, if the total number of properties was lowered to 8, 000 and more brownfield sites were identified for regeneration. In addition to this, in view of the demise of the retail market, there are now many retail sites that could be repurposed for housing i.e. Debenhams in Hemel town centre. The Green belt was set up to protect the character of villages and settlements and put in place to prevent those areas merging into adjoining towns , therefore becoming one giant urban sprawl. The proposals to further develop land at Rectory Farm puts Kings Langley village in jeopardy of joining up to Apsley and Hemel Hempstead.

I urge you to reconsider development on Green Belt. Once the land has been lost to housing, our wonderful stretches of greenery , fields ,trees and wildlife, that provide us and future generations, such comfort and enjoyment , will be lost for ever. Please think again and explore different options.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8019

**Person ID** 1266027

**Full Name** PIPPA HARRAND

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Re Local Housing plan for Dacorum  
We strongly disagree with the plan for the type and number of additional houses in Berkhamsted and Tring.  
Although we accept the need for the provision of new properties, the plan is misconceived as a significant amount of green belt will be lost plus the fact that it will put a considerable strain on the current and future planned infrastructure. It appears that the volume of houses proposed in the Berkhamsted and Tring area is disproportionate to the number of new homes in the whole of Dacorum.  
Berkhamsted is already overpopulated based on the current roads and local amenities, water pressure is fluctuating and it seems that you are trying to cram in as many houses as possible regardless of quality of life for all current and future residents of this town.  
We have seen through the pandemic how much everyone uses the green spaces that we have and how much they are needed for both physical and mental health in the area.  
This proposal needs revisiting in order to get the support of the local community.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8038

**Person ID** 1266036

<b>Full Name</b>	Dr R J Stubbs
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The housing needs appear to be based on outdated 2014 data from the Office of National Statistics, (ONS). Whereas if the most recent 2018 data from the ONS had been used there would have been a significant reduction in need for housing.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8040
<b>Person ID</b>	1266036
<b>Full Name</b>	Dr R J Stubbs
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The impact on the Green Belt appears to be greater than necessary, as the Plan does not appear to have considered either potential Brown Field sites or the recent move to the conversion of business and retail premises to residential housing
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8046

<b>Person ID</b>	1152837
<b>Full Name</b>	Suzanne Jannese
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; 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>I am commenting on all sites here: 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty. Although the Council states that a key objective is "minimising and managing</p>

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 (including that of the hugely important Chilterns Beechwoods SAC), will cause significant harm to the Green Belt and AONB. 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8060

**Person ID** 1266042

**Full Name** Hannah Briggs

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

As a young person who would be looking to buy their first house in the upcoming years, I am struggling to see how this development would decrease house prices or make it easier to get on the property ladder for first time buyers. I feel as though I would not be able to find a house in my hometown of Berkhamsted as I am not eligible for affordable housing schemes but would also not be able to afford a regularly priced house in the area. By increasing the number of houses in Dacorum does not guarantee a reduction in market value and would largely cater to middle class people who are already on the property ladder and would likely be able to afford living in Dacorum already. As a Dacorum resident I feel this would do nothing to increase diversity in the area and would be unlikely to draw in younger people to replace the ageing population of Dacorum.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8061

**Person ID** 1266044

**Full Name** CARINA GHIONI

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing</li> <li>- Failure to address climate emergency issues</li> <li>- Impact on infrastructure and local community</li> <li>- Likely water and water waste disposal issues and damage to chalk streams</li> <li>- The lack of brownfield regeneration proposals.</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> <li>- 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8062
<b>Person ID</b>	1266042
<b>Full Name</b>	Hannah Briggs

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am aware that the calculations used to produce the quota of houses for Dacorum is inflated from the true figure. I urge that the plan is not put into action until this has been rectified. I feel as though this would be a disservice to residents of Dacorum to over produce houses which are not mathematically justified.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8078
<b>Person ID</b>	1266049
<b>Full Name</b>	Mike Plowman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8093

<b>Person ID</b>	1266053
<b>Full Name</b>	Debi Magonet
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing</li> <li>- Failure to address climate emergency issues</li> <li>- Impact on infrastructure and local community</li> <li>- Likely water and water waste disposal issues and damage to chalk streams</li> <li>- The lack of brownfield regeneration proposals.</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> <li>- 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.</li> </ul>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8105
<b>Person ID</b>	1266062
<b>Full Name</b>	Maureen Linehan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I would like to put forward my objections for the Dacorum Local Plan (2020-2038).</p> <ol style="list-style-type: none"> <li>1 The number of proposed houses to be built is excessive and needs to be reviewed.</li> <li>2 The number of affordable housing is not adequate and needs to be reviewed.</li> <li>3 The building on and use of Greenfield sites is not acceptable and could have fundamental impacts on the villages and wildlife of our communities.</li> <li>4 More brownfield sites need to be looked into and derelict buildings that could be demolished and replaced with affordable housing.</li> <li>5 There will not be enough local amenities to support the excessive house building such as school places and doctors appointments.</li> </ol>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8106
<b>Person ID</b>	1266063
<b>Full Name</b>	Clive Leach and Diana Ross
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals in the Dacorum Borough Council Emerging Strategy for Growth, particularly the massive proposed development in the countryside and its impact on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and wastewater disposal will be felt across the whole borough and beyond.</p> <p>In particular, I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing</li> <li>- Failure to address climate emergency issues</li> <li>- Impact on infrastructure and local community</li> <li>- Likely water and water waste disposal issues and damage to chalk streams</li> <li>- The lack of brownfield regeneration proposals.</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> </ul> <p>The Plan is at odds with the recent government desire to address the imbalance of investment between England's north and south. 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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8117
<b>Person ID</b>	1266071
<b>Full Name</b>	Nigel Hall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	

* No	
<b>Spatial Strategy for Growth comment</b>	<p>I wish to object to Dacorum Borough Councils draft plan to build on 850 acres of green-belt and urban green space the reasons for my objection are as follows:</p> <ol style="list-style-type: none"> <li>1 The draft plan fails to take into account brown-field and urban centre locations for housing - in particular in exiting town centres, where following the COVID pandemic there are likely to be shops and offices capable of being converted to housing.</li> <li>2 The proposals are unsustainable and will drive more traffic movement, increase waterfront off and further erode the green belt. All housing development should be in already developed areas.</li> <li>3 The proposals fail to address the additional burden on existing infrastructure.</li> </ol> <p>I would be grateful if you would confirm receipt of this objection.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8119
<b>Person ID</b>	1266073
<b>Full Name</b>	Hayley Beresford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>I <b>strongly object</b> to the Strategy for Growth plans for the following reasons:</p> <ul style="list-style-type: none"> <li>• Too many houses - DBC should challenge the government's numbers. Incorrectly calculated, more than double numbers required, unreasonably high.</li> <li>• Green belt land! Protected! Should not be built on!</li> <li>• Substantial increase in traffic (due to building in area where cars are required) and therefore pollution</li> <li>• Current infrastructure will not cope with substantial increase in traffic, it is already struggling with tailbacks along Shootersway and that is before current development at Bearroc park is complete.</li> <li>• Negative effect on mental health of current residents and new residents as overdeveloped, not enough green space, pollution, traffic tailbacks, unpleasant place to live</li> </ul>

- Negative effect on health of current residents and new residents due to pollution, lack of green space to exercise in
- Detrimental effect on wildlife if green spaces taken away
- Unsuitable location for houses right next to busy A41 - noise, pollution.
- No effective traffic solutions eg alternative entrance to A41 to alleviate traffic along Shootersway and roads off (Darrs, Durrants, Kings road). More traffic lights and roundabouts will not work.
- Roads next to school (St Marys C of E Primary School) are too busy already and children and parents walking along these roads do not feel safe.
- Schools in area such as Greenway School are oversubscribed already.

I strongly object.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8127

**Person ID** 1266081

**Full Name** Steven and Megan Reitz

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

As residents of Potten End village we wish to object strongly to the proposed plan - we already have a large amount of high speed traffic travelling through our village which have resulted in a number of accidents close to the school. The proposed housing increases in the Berkhamsted / Northchurch and Tring areas will drastically increase the through traffic as through Potten end is the most direct route to the M1. The increase in traffic will destroy village life - our children will no longer be able to safely walk to the green or the village shop as water end road will become too dangerous for them to cross.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8135

<b>Person ID</b>	1266083
<b>Full Name</b>	Melissa Angell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I urge DBC to protect our precious greenbelt when planning future developments. Once it's gone it can never be recovered and is so important for environmental wellbeing, along with the wellness of local residents who enjoy living in such a green and pretty location.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8139
<b>Person ID</b>	1262256
<b>Full Name</b>	Sarah Marshall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Following on from my response via the Internet (I am not sure it worked successfully) I have also written below. I am a resident of Markyate, concerned for our local community but also across the Borough.</p> <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>

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8142

**Person ID** 1266086

**Full Name** Sarah Pearcy

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

To whom it may concern  
 I live in flamstead village and I am strongly against the proposed idea of building more housing in Dacorum. I wish my opinion to be considered. Thank you very much

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8152

**Person ID** 1266094

<b>Full Name</b>	Susan Forster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I would ask you all to consider the long term effect this plan will have on our community. I will keep this short as you will have had many responses. We do need housing and a key consideration should be what do we want our community to look like in the future. Simply building houses will not be the answer, we need infrastructure to be considered first; water supply, sewerage, schools, transport etc. Please think carefully as your decisions will impact us long after you have retired from your present positions and our children and grandchildren will have to bear the consequences.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8160
<b>Person ID</b>	1266105
<b>Full Name</b>	Dina Westenholz-Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<b>Green belt grab insupportable and unjustifiable</b> If implemented, these damaging proposals would result in the loss of <b>a massive 850 hectares of the Green Belt, the wider countryside and urban green space</b> for development.  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.

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.

**Housing type developer-led, rather than needs-led**

It is of great concern to me that in practice the prime consideration in site selection appears to be land availability rather than appropriateness or sustainability. This has led to many of the larger swathes of Green Belt that are earmarked for development being at some distance from town centres, employment hubs and public transport.

I am also concerned about the very low number of social housing units included in the DLP, as distinct from “affordable”, which are often at 80% market rates.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8161

**Person ID** 1266109

**Full Name** Jeff Trindell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8174

**Person ID** 1266117

**Full Name** Vanessa Manikin

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth 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** Spatial Strategy for Growth

**ID** EGS8178

<b>Person ID</b>	1266122
<b>Full Name</b>	Andrew Clark
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>The number of new houses planned for Dacorum is far too high. This will ruin the semi rural feel of our special town, which is situated on the edge of an area of outstanding natural beauty.</p> <p>The building proposed would be on green belt land, and this needs to be preserved for future generations. This is especially true for the plans around hemel Station which will ruin the feeling the moor, which is a unique place.</p> <p>The plans for one of the most beautiful market towns, berkhamsted are similarly not well thought through. They might result in the merger of bourne end and berkhamsted,ruining the unique feel of both of these areas.</p> <p>All of this without a hospital is pure idiocy</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8204
<b>Person ID</b>	1266150
<b>Full Name</b>	Michela Capozzi
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>DBC have an obligation to review the number of properties needed in this area and to start to think innovatively about finding and developing brown field sites; re-purposing buildings in town centres where access to amenities will be close</p>

at hand. The current Plan is lazy and thoughtless. It lacks details and the omissions only serve to highlight how DBC know it is wrong and have tried hard to cover up the issues they know this Plan creates.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8210

**Person ID** 1158423

**Full Name** Richard Frankel

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Please take this email as my formal response - ie Objection - to the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Consultation.

As a resident, I implore DBC to reconsider this plan which imposes massive over-development on an already near-capacity environment, with severe implications for the integrity of the Green Belt and our status as an AONB (in fact the 2019 Glover report recommended that the Chilterns should be given National Park Status). Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily.

The following are my principal objections:

1 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.

2 Over provision of housing. The council has not used up-to-date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares of Hertfordshire Green Belt land, countryside and urban green spaces in order to build 16,596 new homes.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8213

**Person ID** 1158423

<b>Full Name</b>	Richard Frankel
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	6 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8216
<b>Person ID</b>	1266154
<b>Full Name</b>	Iain Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	(5): Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. <b>DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.</b>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8222
<b>Person ID</b>	1207978
<b>Full Name</b>	Alison Sexton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>With regards to the Dacorum Local Plan I would like to make some observations. I have been assured by local councillors that responses by email will be considered.</p> <p>As an overview first, I feel that the Dacorum local plan includes a massive amount of building and I sincerely question whether this enormous level of development is justified. The green spaces between and within the existing Dacorum communities are responsible for making this area a nice place to live. Taking away these green spaces to such a degree will irrevocably change the character of many areas and instead create an unappealing urban sprawl. Some areas of town centre development make good sense, using land whose use has changed or evolved over the years but other parts of the plan, HH01/02/21/22 in particular, in my opinion constitute large scale green belt vandalism. Within all of the proposed areas care must be taken to preserve the trees and hedgerows which not only provide habitats for wildlife but are also vital in slowing climate change and have natural advantages as windbreaks and noise breaks for residents. Promises to plant new trees are absolutely not the same as the vital role already established plants play. The proposal includes many thousands of new dwellings. Whilst I understand the need for some new housing, I have to question expansion on this scale, and I believe that the plan is not simply catering for natural growth of the Dacorum population but will encourage movement of new people to the area. It is a shame that we should potentially ruin many areas of beautiful green space for the sake of accommodating people who are yet to even live in Dacorum.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8247
<b>Person ID</b>	1266156
<b>Full Name</b>	Benjamin Roberts

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Headline numbers preposterous and unsustainable</b></p> <p>The most problematic aspect of this plan, and from which many of the other problems flow, is the headline growth number – a total of 16,000 new homes, representing a staggering 25% increase in the population. The algorithm used to calculate the new housing target of 922pa has already been discarded by central government. It has been replaced by an even more dubious target that relies on ONS growth figures from 2014, even though these have been shown to be incorrect and have been superseded by 2018 figures. Had the calculation used more recent population projections, the housing targets for Dacorum would be half the amount proposed in this DLP. Apart from everything else that is problematic about bogus numbers, this error renders the DLP at odds with NPPF s.31 which states that “all policies should be underpinned by relevant and up-to-date evidence”.</p> <p>There is little evidence, apart from some mutant algorithm, to justify these huge jumps in the population. Where is the evidence that Dacorum “needs” this level of additional homes?</p> <p>Given that the Government has withdrawn the housing needs methodology on which the Plan is based, that the revised methodology uses out of date data, and that the Government has stated that its projected building numbers are not a target, why has the Plan not been withdrawn until there is some clarity of what Dacorum’s housing need is?</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8251
<b>Person ID</b>	1266156
<b>Full Name</b>	Benjamin Roberts
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p><b>Green belt grab insupportable and unjustifiable</b></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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8307
<b>Person ID</b>	1266175
<b>Full Name</b>	Anna Foster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>I am disappointed to see that Northchurch, where I live, is not even mentioned in the plan. It's hugely disrespectful to label it West Berkhamsted. It seems that the plan would merge towns into one another, with vast swathes of green between Hemel, Berkhamsted and Tring all being built upon, thus merging our towns and villages which currently all have their own character.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8308
<b>Person ID</b>	1266175
<b>Full Name</b>	Anna Foster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Adding this many houses in a valley-ed area will inevitably create a lot more car journeys, which will not help with the council's commitment to climate change. I also don't see how building on this scale will see DBC becoming net zero by 2030. Since Dacorum Borough Council declared a climate emergency more than a year ago, I don't see how this plan does anything to help with that.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8309
<b>Person ID</b>	1266175
<b>Full Name</b>	Anna Foster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I cannot see any reason for Green Belt to be used for so much of this plan. Where is the justification? I want my children to be able to enjoy the green spaces we moved here for – so I do not agree with this strategy. I believe there to be not enough evidence for precious Greenbelt on or bordering the AONB to be used for housing, this needs to be stopped.

The pandemic has taught us that more than ever we need our green space – we live in Northchurch and love what it offers for us, wildlife and nature – we do not want to see this precious resource destroyed for the sake of needless housing.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8317

**Person ID** 1266175

**Full Name** Anna Foster

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

**6/ Do you have any comments on the sustainability of the proposal?**

I believe there to be water supply issues already in this area, and I would not want the important chalk aquifer to be utilised for this. The ecology of the chalk streams is of international significance. As such the plan is unsustainable. There also doesn't seem to be enough provision of infrastructure – there is already incredible strain on roads, public transport, doctors, schools – so how will all of this work under this plan. As I said above I do see the need for a new school, but I am unconvinced that all possible sites have been analysed for a new school.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8335

**Person ID** 1266195

**Full Name** Janice Boyce

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to object to Dacorum local planning emergency strategy.</p> <p>My objections are that the projected number of houses way exceed local demand. This plan will be detrimental to local residents being able to afford these houses as they will be marketed to people outside of Dacorum who have the ability to buy houses at inflated prices. The only beneficiaries will be the developers. The area can not sustain such a big influx of houses as we have no infrastructure such as schools, doctors, dentist and a hospital to support. The existing roads can not cope with the traffic at the moment so will not cope with this amount of planned houses.</p> <p>The loss of the green belt is horrendous and we are just being surrounded by concrete. Dacorum is being used as an overflow for London and soon there will be no separation between Dacorum and London.</p> <p>By agreeing to such large over development the councillors are letting down the people of Dacorum who they are meant to represent. This development being considered looks like the councillors are more concerned with towing party lines</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8337
<b>Person ID</b>	1266198
<b>Full Name</b>	Katherine Fielden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am emailing you to express my objection to the proposed development outlined in Dacorum Borough Council's document entitled "Emerging Strategy for Growth (2020 – 2038).</p> <p>As a resident, I implore DBC to reconsider this plan which imposes massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt and our status as an AONB (in fact the 2019</p>

Glover report recommended that the Chilterns should be given National Park Status). Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily.

The following are my principal objections:

1 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.

2 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.

3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.

4 Impact on infrastructure. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing. It ignores issues such as traffic congestion, education provision and healthcare requirements.

5 Water supply and waste water. The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's three chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. In addition the proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion. If this is not addressed potential pollution of watercourses, especially in times of storm, is extremely likely.

6 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8356
<b>Person ID</b>	1265009
<b>Full Name</b>	Sue and Paul Dupree

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I have read your reports on this matter and I do NOT agree that 16,000 houses should be in the plan as this seems too high a figure. Markyate is part of the Dacorum and we have already seen a lot of new houses built on the edges of the village and the infrastructure will not cope with even more houses and people living in the area. Jobs need to be created first.</p> <p>The A5 road is already clogged with traffic during the busy periods and the main high street will not cope with increased traffic and there is no room to widen roads and exits in and out of the village. We also have the increased traffic for the London/Luton airport who want to increase the capacity of the flights in and out of the area. This will impact on the M1 motor ways and the A5 and outwards to the airport. If you read the plans on the airport expansion not all the workers working, there, will or have been employed from this area. So, housing will not always be needed to support this business. There also should be a corridor for the increased planes taking off and landing to and from Luton airport as there will be a low quality of life for the people living directly under the flight path north and south of the village. It is already intolerable at times to have the windows open when it is in fully operational.</p> <p>The green belt around the village must be protected as it protects the shape and size and character of the village and towns in the area to prevent them all emerging in to one long sprawl of a town area. Green spaces have been a boom during these covid times and have been valuable during this time for exercise and also a barrier for the covid virus. People in the village have not been going to the big towns to shop and are trying to stay at home to stop the spread. A natural barrier for future pandemics!!</p> <p>The worst hit has been the overcrowded areas of the country and the local towns. There will also be in the future, more, brown field sites as this pandemic have more people working from home. This, I think will continue in the future times when the virus is under control.</p> <p>The plan does not include a proper plan for the infrastructure for the hospitals, Watford is too far to get there and there are no direct transport links to Watford, police stations schools.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8380
<b>Person ID</b>	1266209
<b>Full Name</b>	Sylvia Baronin von Hahn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing</li> <li>- Failure to address climate emergency issues</li> <li>- Impact on infrastructure and local community</li> <li>- Likely water and water waste disposal issues and damage to chalk streams</li> <li>- The lack of brownfield regeneration proposals.</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> </ul>

- 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8382

**Person ID** 399112

**Full Name** Mrs Sally Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Having reviewed your strategy for the Dacorum Growth Plan I feel compelled to register my deep concerns over proposals to the UK Government to build up to 16,000 new homes in the local area. This will likely increase the local population by up to 60,000 people with significant impact on the environment and an overwhelming impact on infrastructure already strained by recent development. A possible 40% growth in population is shocking and an ill-planned development would have a devastating long term effect on a quality of life.

In Berkhamsted ,with existing population of approximately 18,000 , you propose an extra 2,200 homes with a possible increase of residents of 8,000+. A potential 42% population increase would undoubtedly have disastrous consequences for the area. Having lived here happily since 1986 and witnessed the deterioration both to the environment and our local infrastructure caused by existing developments, it is a frightening prospect.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8392

**Person ID** 1266222

**Full Name** Paul and Helen Stephens

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>In response to the draft local plan entitled 'Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation' we would like to register our objections as follows:</p> <ul style="list-style-type: none"> <li>— I object to the proposals in the consultation because we are fundamentally opposed to the proposals to build on the green belt</li> <li>— I understand that there needs to be proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown: <ul style="list-style-type: none"> <li>— The housing projections are based on out-of-date statistics</li> <li>— The needs of local people have not been prioritised over the needs of developers</li> <li>— There has not been enough scrutiny of brown field sites</li> <li>— COVID19 has changed behaviour meaning more town centre development is possible - this has not been taken into account</li> <li>— There are too many houses, yet not enough social and affordable housing - we should be building the right houses in the right places for local people - not giving a green light to urban sprawl</li> <li>— Not enough care has been taken to protect the local ecology - the demand for water will damage the aquifer and the internationally recognised chalk streams</li> <li>— The plans are not carbon neutral and conflict with commitments to tackle climate change</li> <li>— The houses proposed will encourage people to use cars as they are not near employment or transport hubs.</li> <li>— The increased populations in Tring and Berkhamsted will mean more traffic travelling along Northchurch High Street, leading to congestion, increased pollution, health problems, road safety concerns — this will be bad for the mental and physical health of our residents and future generations.</li> </ul> </li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8399
<b>Person ID</b>	404933
<b>Full Name</b>	Mr George Luff

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am strongly against the plans for development of new houses in the Dacorum Local Plan.</p> <p>Given that the Local Plan is until 2038, how does Dacorum begin to establish the number of houses required when:</p> <ul style="list-style-type: none"> <li>• The government formula for establishing the number of new houses seems to be unclear. (<i>Dacorum Local Plan</i>)</li> <li>• The birth rate has fallen to 1.68 children per family when it needs to be 2.1 to keep population numbers stable i.e the population will fall (<i>ONS</i>)</li> <li>• The <i>Migration Observatory</i> looked at a number of different estimates done of the irregular migrant population since 2001. These put the figure as low as 120,000 or as high as 1.3 million.</li> <li>• The impact of Brexit on the population.</li> <li>• The impact of Covid 19 on population size particularly amongst the elderly.</li> <li>• The impact of Covid 19 on working and travel patterns.</li> <li>• The impact of Covid 19 and Brexit on the High Street and out of town shopping precincts (which could be treated as brownfield sites if shopping patterns change).</li> </ul> <p>What is meant by “objectively assessed” in “<i>The Council has set out to develop a strategy which, as far as possible, accommodates its objectively assessed development needs. For housing, based on the most up to date information provided by Government, this constitutes 922 dwellings per annum, or 16,596 homes over the Plan period. The Council has made provision for 16,865 dwellings to provide a buffer. For employment the emerging growth strategy proposes 116,500 sqm of additional employment (industrial) space to be provided across the Borough. (Dacorum Local Plan).</i></p> <p>Given the factors outlined above and “objective assessment” cannot be possible. If this is the Government’s objective assessment Dacorum’s electorate and council tax payers should rightly ask why Dacorum is disadvantaging local communities at the behest of Central Government. Who is Dacorum answerable and accountable to? It seems the answer is ‘<i>The Masterplan will be prepared by the Council and adopted as an SPD working in collaboration with key partners and landowners and be subject to community and stakeholder involvement.</i>’ - so developers and landowners take precedence over those that live and vote here. Community involvement comes as a poor third or fourth place.</p>

Dacorum cannot forecast its housing needs and allocations under current circumstances and should not, in any case, be solving London's dysfunctional and frequently dishonest housing issues.

There is no justification for 'Dacorum ... 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, more than double the number (430 dwellings per year) in the previous Core Strategy. In addition to this, we are releasing additional land from the Green Belt around Hemel Hempstead (as part of the Hemel Garden Communities programme) to meet longer term development needs.'

Bold indeed! Objective?

*(All quotes in italics from the Dacorum Local Plan)*

If houses are needed, they should not be provided for the well-off from London but to provide affordable housing for local people.

It is also unconvincing that:

*The Growth Strategy for Berkhamsted and Tring will seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.*

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8401
<b>Person ID</b>	404933
<b>Full Name</b>	Mr George Luff
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><i>Aylesbury has been designated a Garden Town and will grow by at least 16,000 extra homes.</i></p> <p><i>(Quote in italics from the Dacorum Local Plan)</i></p> <p>The corridor from Aylesbury to Watford will simply become a rat run along the valley and there is no way that traffic pollution and its impact on health and biodiversity will be controlled.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8404
<b>Person ID</b>	404933
<b>Full Name</b>	Mr George Luff
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>How is it possible to create “<i>A clean, safe and enjoyable environment: e.g. including policies that seek to protect open spaces and other environmental assets in the Borough.</i>” (Dacorum Local Plan)</p> <p>It is inconceivable that the 20,839 new homes envisaged in the Dacorum Local Plan (including the 500 ‘windfalls’ and the 4000 to be built after 2038 plus the ‘<i>The potential for unmet housing need arising from Watford</i>’ and ‘<i>The delivery of Hemel Garden Community which is a joint growth initiative between Dacorum, St Albans and Hertfordshire County Council and the Local Enterprise Zone Partnership</i>’ is consistent with ‘<i>a particularly sensitive environment in Dacorum in the shape of the quality of our protected landscapes (including the Chilterns AONB) and the presence of the Chilterns Beechwoods SAC. ENV</i></p>

*Making effective use of urban land can also help reduce the pressure on the natural environment by limiting the overall scale of greenfield development. New developments can also play their role by: linking to existing green networks, creating new and varied green spaces, and promoting opportunities for biodiversity and nature conservation.*

There is no chance of Dacorum 'Protecting the character of the wider countryside and the value of protected / important sites as far as possible (such as important landscapes, heritage and biodiversity and avoidance of areas at high risk of flooding)'. Though "as far as possible" is hardly reassuring and leaves wriggle room for failure.

And that:

*The natural environment is one of the Borough's greatest resources and encompasses the landscape of the countryside and green infrastructure within towns and villages, helping to give Dacorum its strong sense of place. It provides a diverse range of benefits to people, nature and the economy, supporting the health and wellbeing of residents, biodiversity, food and energy production, flood control, pollution and much more.*

And that Dacorum's housing plans are consistent with:

*National policy places great importance on sustainable development's role in protecting the natural environment for the present and the future, placing it within the three overarching objectives of economic, social and environmental. New policy to be introduced in England through the forthcoming Environment Bill will aim to restore wildlife habitats, improve air and water quality, and deliver a 'net gain' in biodiversity. It will also make provision to introduce long term, legally binding environmental improvement targets for air quality, resource efficiency and waste reduction, biodiversity and water, by 2022.*

*This will take into law the vision of 'A Green Future: Our 25 Year Plan to Improve the Environment' (2018) which sets out national plans to help the natural world to thrive. To achieve these goals it introduces the principle of biodiversity net gain, and of creating green towns, through stronger standards for the delivery of new green infrastructure and tree planting. In the wider landscape. It aims to enhance the beauty of natural heritage and expand woodland cover.*

*Development should be designed around existing components of the ecological network, and seek to improve, enhance and connect these features with the wider network (NPPF paragraph 174). Developments will also be expected to include a variety of forms of biodiversity within the built environment, such as street trees, wildflower rich verges and swales, living roofs and walls, hedgerows, and sustainable drainage systems designed to enrich biodiversity.*

Dacorum is making heroic assumptions around:

*In Dacorum special consideration needs to be given to:*

*the quality of the groundwater supplying the chalk aquifer;*

*the maintenance of higher quality agricultural areas and the sand and gravel belt;*

*limiting the effects of noise and air pollution along major routes (i.e. road, rail and aircraft from Luton Airport);*

*retaining tranquil parts of the Chilterns Area of Outstanding Natural Beauty and Boarscroft Vale; limiting light pollution, especially in the Chilterns AONB and the rural parts of the Borough; the risks associated with Buncefield Oil Terminal; and*

*ensuring that development land affected by ground contamination is safe and suitable for its proposed use so as to protect human health and the wider environment. The provision and long-term management of a minimum buffer between development and irreplaceable habitats, such as ancient woodland and veteran trees, and hedgerows will be required in line with national standing advice, guidance and recognised good practice. Wherever possible, hedgerows should be retained. Where hedgerow loss is unavoidable, new hedgerows should be created.*

*(All quotes in italics from the Dacorum Local Plan)*

**How does Dacorum's Local Plan relate to:**

### **Defra: A Green Future: Our 25 Year Plan to Improve the Environment**

- *Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term.*
- *Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network,5 focusing on priority habitats as part of a wider set of land management changes providing extensive benefits.*
- *Taking action to recover threatened, iconic or economically important species of animals, plants and fungi6, and where possible to prevent human- induced extinction or loss of known threatened species in England and the Overseas Territories.*
- *Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042.*
- *We will conserve and enhance the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone. We will do this by:*
- *Safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.*
- *Making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing.*

- *Focusing on increasing action to improve the environment from all sectors of society.*

*We will:*

- *Help people improve their health and wellbeing by using green spaces including through mental health services.*
- *Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.*
- *'Green' our towns and cities by creating green infrastructure and planting one million urban trees.*

*(Quotes in italic from Defra's 25 Year Plan)*

**How does the Dacorum Local plan relate to:**

**Chilterns AONB Management Plan 2019-24**

- *Legislation has made it clear that natural is not just the look of the landscape, but includes the landform and geology, the plants and animals, the landscape features and the rich history of human settlement over the centuries'*
- *Panoramic views from and across the escarpment interwoven with intimate dip slope valleys and rolling fields*
- *Nationally important concentrations of chalk downland, extremely diverse in flora and fauna and home to some scarce and threatened species. Once extensive, the downland now only covers 1% of the AONB mostly in small fragments.*
- *One of the most wooded landscapes in England, with 23% woodland cover concentrated in the central and southern areas; 56% of the woodland is Ancient, a particularly rich, distinctive and prominent feature, including the Chilterns Beech Wood Special Area of Conservation; a significant assemblage of box, juniper and beech yew woods; together with many veteran trees and relict areas of wood pasture*
- *Significant ancient hedgerows, hedgerow and field trees, orchards and parkland weaving across farmland that covers approximately 60% of the Chilterns*
- *A dense network of 2000km of rights of way; two National Trails, the Ridgeway and Thames Path; notable regional routes such as the Chiltern Way and the Chilterns Cycleway An impressive quality and quantity of ancient routeways and sunken lanes including the Ickniel Way, part of the Ridgeway National Trail, considered the oldest road in Britain*
- *Relative tranquillity and peace on the doorstep of ten million people, probably the most accessible protected landscape in Europe; relatively dark skies, of huge value to human and wildlife health; unspoilt countryside, secret corners and a surprising sense of remoteness*

*The Chilterns AONB faces unprecedented pressure.:*

- *Highly desirable area, commutable to London*
- *Unprecedented housing and infrastructure*
- *growth within and in the setting of the AONB*
- *Construction of HS2 through the Chilterns at its widest point*
- *Airport expansion and increased over-flying*
- *Creeping suburbanisation and gentrification*

- *Lack of affordable housing*
- *Erosion of character*
- *Increased noise, air and light pollution*
- *Habitat severance, degradation and loss*
- *Less enjoyable to visit*
- *New building designs not locally distinctive*
- *Housing even less affordable for local community*

*The Chilterns saw major losses in area of characteristic habitats and landscape features over the course of the 20th century including Chalk grassland 54% lost, Commons, greens and heaths 43% lost, Ancient woodland 9% lost*

*It is clear that action that is more effective is needed – for example, landscape scale conservation initiatives that go beyond existing wildlife sites – if we are to halt and reverse these declines.*

*Housing and transport infrastructure and changes in land use continue to leave a legacy of habitat fragmentation.*

*Examples include:*

- *severed hedgerows;*
- *culverted chalk streams;*
- *small, isolated islands of chalk grassland;*
- *ancient woodland or traditional orchard habitat isolated within intensively managed arable land.*

*The 25 year Environment Plan contains ambitious proposals for net environmental gain in relation to impacts of development, and the need to minimise impact of development on and provide net gains for biodiversity is enshrined in government policy (National Planning Policy Framework). Yet there is no proven delivery mechanism to secure net gain at the point where development impacts on the AONB or its setting.*

*It is a place for relaxation, exploration and inspiration, offering a rich cultural heritage, contact with nature, a sense of place and numerous opportunities for leisure, recreation and learning. However, there is low awareness of the Chilterns and the benefits it provides to society and as a visitor destination. Its value is not fully realised, in particular its contribution to peoples' health and wellbeing. In addition, communities and businesses do not always recognise and value the importance of their role as custodians of this heritage.*

*(All quotes in italic from the Chiltern AONB 5 year plan.)*

**Included files**

**Title**

Spatial Strategy for Growth

<b>ID</b>	EGS8420
<b>Person ID</b>	1266236
<b>Full Name</b>	Tracey Harper
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing</li> <li>- Failure to address climate emergency issues</li> <li>- Impact on infrastructure and local community</li> <li>- Likely water and water waste disposal issues and damage to chalk streams</li> <li>- The lack of brownfield regeneration proposals.</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> <li>- 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.</li> </ul>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8425
<b>Person ID</b>	1266240
<b>Full Name</b>	JANE HILL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am e mailing to raise my objection to the proposed building plans for Dacorum, where over 16,500 homes are due to be built. In my opinion this number is far too high and they will have nothing but a negative impact on the area.</p> <p>We should not be losing any more of the greenbelt. My family and I enjoy walking in the area and think that we are currently blessed with wonderful areas of greenery and beautiful scenery, these areas should not be lost. We must also consider the negative impact on the environment.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8431
<b>Person ID</b>	1266244
<b>Full Name</b>	ALAN REEVES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Spatial Strategy for Growth comment</b>	<p>Our household disagrees with the plan and object to building on our precious Green belt .</p> <p>Traffic is already queuing the full length of Shooters way, schools are over subscribed , Doctors over subscribed , pollution and congestion hugely increased in recent years.</p> <p>I thought the Conservative Party wants to build back better and greener!!</p> <p>Our Council decides to do the opposite, destroy our countryside, cause more pollution, cause more congestion.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8432
<b>Person ID</b>	1266245
<b>Full Name</b>	LORRAINE REEVES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>Our household disagrees with the plan and object to building on our precious Green belt .</p> <p>Traffic is already queuing the full length of Shooters way, schools are over subscribed , Doctors over subscribed , pollution and congestion hugely increased in recent years.</p> <p>I thought the Conservative Party wants to build back better and greener!!</p> <p>Our Council decides to do the opposite, destroy our countryside, cause more pollution, cause more congestion.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8438
<b>Person ID</b>	1266251
<b>Full Name</b>	ANTHONY TYRER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>As a local resident I wish to strongly object to the proposed local plan based on the following points:</p> <p>Numbers</p> <p>The proposed number of houses to build is based around an initially inaccurate number, which has then been revised using out of date ONS projections.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8445
<b>Person ID</b>	1266276
<b>Full Name</b>	BARBARA ANSCOMBE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

## Spatial Strategy for Growth comment

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development

rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8464

**Person ID** 1266292

**Full Name** JULIA MILLS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

As a Berkhamsted resident I am writing to express my opposition to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.

The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.

In particular I am extremely concerned about:

- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation
- Over-provision of housing
- Failure to address climate emergency issues
- Impact on infrastructure and local community
- Likely water and water waste disposal issues and damage to chalk streams
- The lack of brownfield regeneration proposals.
- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8493

<b>Person ID</b>	1266311
<b>Full Name</b>	Dr Gwynneth Down
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><i>Climate emergency</i></p> <p>We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan. Currently it is not.</p> <p>It is very important that the recognised Climate Emergency acts both as a driver and brake to the plans. This plan as it stands prioritises housing construction over the Climate Emergency.</p> <p>The expectation that Tring will accommodate at least 2700 new homes is not sustainable. As above, the 55% increase in the size of Tring is by far the largest within the plan for Dacorum and is likely to impact greatly on wildlife and biodiversity by destruction of hedgerows and other habitats, wildlife corridors and by the increase in population, cars, and pollution.</p> <p>Statements are made about planning for a low carbon future but insufficient detail is given on how it would be achieved. Part of the policy is '<i>encouraging on-site renewable and low carbon energy sources on development sites, and stand along renewable energy or low carbon schemes</i>' (Policy SP10, p100). In the climate emergency, encouragement is not sufficient and is likely to be largely ignored in deference to economics. There must be stringent requirements made of developers to use green technologies, and net zero carbon emissions. The Local Plan should have a commitment to all new homes being certified zero carbon and sustainable in order to address the climate emergency. The knowledge and technology to make good affordable zero carbon sustainable homes exists and the Local Plan should prioritise this.</p> <p>There are admirable aspirations included within the plan about creating new spaces for nature conservation or Local Nature Reserves, however this should not be at the expense of losing widespread open countryside and land which contribute to the AONB and Green Belt land. This would completely defeat the purpose! The plan should be detailed about how protection and enhancement of habitats and green and blue infrastructure would be achieved.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8494
<b>Person ID</b>	1266311

<b>Full Name</b>	Dr Gwynneth Down
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><i>Housing expansion</i></p> <p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a</p>

requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8504

**Person ID** 1266311

**Full Name** Dr Gwynneth Down

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8530

**Person ID** 1260547

**Full Name** Mark Pawlett

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I would like to voice my opinion of opposition of the Strategic Plan on the basis of proposed development on Green Belt land. This Green Belt designation was designed to protect our countryside and biodiversity. Developing on Green Belt will damage the area substantially.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8531
<b>Person ID</b>	1266468
<b>Full Name</b>	Kate Locke
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I have lived in Berkhamsted for over 25 years and I oppose the Dacorum Local Plan - Emerging Strategy for Growth. The assumptions on which this proposal is made are flawed and based on old data. Any decision must be made on accurate data.</p> <ol style="list-style-type: none"> <li>The data and maths being used to calculate the number of homes needed is demonstrably inaccurate. The current plan agreed back in 2017 requires the building of 430 houses a year and the ONS data has <u>reduced the number of dwellings it calculates will be needed by more than 50%</u> since then down to 355. The government has used an algorithm to turn the ONS number of 355 into 1,023 dwellings. Lets' all remember for a moment how tragically inaccurate and destructive the algorithm used to calculate exam grades was. This algorithm is similarly inaccurate and the number of proposed houses should be urgently revised downwards to a number that is backed by the data.</li> </ol>

- 2 This plan will build on the Green Belt and impact on AONB. Destroying our green space ignores the most recent research done during the pandemic which clearly demonstrates how valuable green space and nature is to our community's mental health and well being.
- 3 There is no clear detail on how public amenities such as water and sewage will cope with all this additional development.
- 4 There is no explicit detail as to 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.
- 5 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** Spatial Strategy for Growth

**ID** EGS8534

**Person ID** 1266478

**Full Name** JOHN ABERCROMBY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

In response to the draft local plan entitled 'Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation' I would like to register my objections as follows:

- I object to the proposals in the consultation because the proposals to build on the green belt are wrong.
- I understand that there needs to be proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown:
  - The housing projections are based on out-of-date statistics
  - The needs of local people have not been prioritised over the needs of developers
  - There has not been enough scrutiny of brown field sites
  - CV19 has changed behaviour meaning more town centre development is possible - this has not been taken into account

— There are too many houses, yet not enough social and affordable housing - we should be building the right houses in the right places for local people - not giving a green light to urban sprawl

— Not enough care has been taken to protect the local ecology - the demand for water will damage the aquifer and the internationally recognised chalk streams

— The plans are not carbon neutral and conflict with commitments to tackle climate change

— The houses proposed will encourage people to use cars as they are not near employment or transport hubs.

— The increased populations in Tring and Berkhamsted will mean more traffic travelling along Northchurch High Street, leading to congestion, increased pollution, health problems, road safety concerns — this will be bad for the mental and physical health of our residents and future generations.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8538

**Person ID** 1266479

**Full Name** DAVID BARTHOLOMEW

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I am emailing you to express my objection to the proposed development outlined in Dacorum Borough Council’s document entitled “Emerging Strategy for Growth (2020 – 2038). As a resident, I implore DBC to reconsider this plan which imposes massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt and our status as an AONB (in fact the 2019 Glover report recommended that the Chilterns should be given National Park Status). Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily.

The following are my principal objections:

- 1 Over development of protected green belt land, the Chiltern’s AONB and the Chiltern’s Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.
- 2 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850

hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.

3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.

4 Impact on infrastructure. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing. It ignores issues such as traffic congestion, education provision and healthcare requirements.

5 Water supply and waste water. The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's three chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. In addition the proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion. If this is not addressed potential pollution of watercourses, especially in times of storm, is extremely likely.

6 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8542

**Person ID** 211354

**Full Name** Mrs Laura Sanderson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Houses will be accommodated 3-4km from the town centres, a distance away from "passenger transport and other services, facilities and employment opportunities". Paragraph 19.6 of the Plan does say "In Dacorum, we consider that

there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries.’ What are the "exceptional circumstances" which justify such ruination?  
 BRAG have demonstrated that DBC is building a massive oversupply of housing compared to ONS estimates. Why?  
 As BRAG states :  
 “Statement 2 in SP2 starts “The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring”. BRAG is concerned about this wording as in its current form it suggests that ‘investment’ will be focused on Hemel Hempstead and that investment will be supported by the growth at Berkhamsted and Tring. Certainly, historically infrastructure investment in Berkhamsted has not matched housing growth, while the majority of funds raised through s106 from developers compensating for the failure to build affordable housing and the Community Infrastructure Levy (CIL) payments have gone into Dacorum’s coffers for funding investment elsewhere. With much higher CIL payments in Berkhamsted than elsewhere in Dacorum, it is easy to see the fiscal attraction of promoting development in Berkhamsted, but if that is a driver then it is wrong.”  
**Other key points:**  
 23.119 accepts that “congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.  
 The new developments in Berkhamsted and Tring are so far from transport of other amenities that they cannot be justified sustainably - walking and cycling are not solutions.  
 Developers find Berkhamsted much more attractive than Hemel Hempstead so that people can move into Berkhamsted rather than satisfying local need which is surely what the Planning Strategy should be about. The Planning Strategy is more about building high rateable value properties that providing what the residents actually want.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8558
<b>Person ID</b>	1266481
<b>Full Name</b>	JUDITH HALDEN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>I am writing to urge you to reconsider the local housing plan for Dacorum.</p> <p>Having just had these plans drawn to my attention and am shocked to see the extent that this new plan will affect the Green Belt Land in this area.</p> <p>It will put an even more enormous strain on the already overloaded infrastructure eg surrounding roads, including the A41, secondary schools, doctors' surgeries, train services for commuters and other local facilities, which are already struggling to meet the challenges of the number of cars and people already in this area.</p> <p>The building of so many houses will also hugely damage the setting of the Chilterns Area of Outstanding Beauty and make the area even more polluted.</p> <p>I shall look forward to hearing about how you are going to reconsider this plan for the good of the people and the community of Dacorum</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8569
<b>Person ID</b>	1266567
<b>Full Name</b>	CAROLINE SMALES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8586

<b>Person ID</b>	1144583
<b>Full Name</b>	Mrs Cath Dickins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am wring in response to the Dacorum Borough Council (DBC) Local plan.</p> <p>I am very disappointed to read that the Council is proposing to build so many new homes over the next 18 years - this is not residents want and will have a major impact in the area.</p> <p>This proposal to build 16k new house over the next 18 years will clearly result in the loss of valuable green belt land .</p> <p>Please explain why the Council has used outdated data from 2014 and not the most data from 2018 which halves the number of homes needed to be built?</p> <p>Your plan concerns me greatly as building large numbers of new homes requires the appropriate infrastructure and your plan does little to address this and will place a high burden on the current infrastructure. It is not just about building homes – public services such as schools / healthcare / travel options all need to be carefully considered.. Pre COVID-19 pandemic, roads during rush hour were massively congested causing driver stress and pollution. You cannot just build homes and not consider the wider implications ..</p> <p>The COVID-19 pandemic this past year has clearly shown that green open spaces are invaluable for people’s health and well-being and your plan to build so many new homes will destroy people’s access to green areas.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8594
<b>Person ID</b>	1264378
<b>Full Name</b>	Nicholas Kurth
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>My comments are as follows:</p> <ul style="list-style-type: none"> <li>- It would be helpful to clarify what the drivers are for the additional housing to be put into the area. Without understanding the background, it seems that the area has accepted a difficult target without any balancing or limiting arguments.</li> <li>- There appears to be minimal attention paid to the preservation of the Green Belt. Indeed, it needs to be demonstrated that a distinctive Green Belt is being maintained around individual towns - I would call it the Duncan Sandys test. Failure to do this will ensure that communities merge into an amorphous mass of London extensions, with all the disadvantages of soulless societies. Without question, it feels that there is a continuing erosion of towns' Green Belts and there needs to be demonstrable criteria applied to avoid this happening.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8601
<b>Person ID</b>	1207775
<b>Full Name</b>	Heather & John Ebdon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>5.2 et seq The Green Belt</b></p> <p>The Plan talks of “minimising and managing the requirement for development on the Green Belt” but tacitly does everything to promote such development by inflating housing need numbers and not being creative in identifying and bringing forward brownfield sites. The principle of Green Belt and AONB land being released “only in exceptional circumstances” is breached on the grounds of expediency; surely a Green Belt is most required when pressures from developers are at the greatest. The lesson of history is that a resolute defence of the Green Belt would divert development pressure to brownfield sites that will benefit generations to come who will not be faced with wall to wall concrete over great swathes of the Borough.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8605
<b>Person ID</b>	1266586
<b>Full Name</b>	Chloe Milbank
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Whilst I understand the need to increase housing, this should be done in line with the level of need and in a sustainable way that preserves the valuable greenbelt land and it's habitats. The plans to increase housing in the area by 16,600 new homes is completely excessive to what the projected need is. This growth in household numbers is a 25% increase over the current housing stock. This would irrevocably change the character of our towns and villages. The latest ONS data available projects 6051 new homes by 2038 - 64% fewer than this plan projects. I therefore object to the proposed plans and would like this email put forward to the decisions board.</p> <p>There is already incredibly high demand for services such as traffic needs, schools and healthcare in the Dacorum area. In addition, the plan does not commit to any level of sustainability in its sustainability targets which is unacceptable. A booklet through a few doors and some information on the website is insufficient to inform all residents of Dacorum, to serve a fair and just consultation, especially during these challenging times.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8607
<b>Person ID</b>	1145882
<b>Full Name</b>	Dr Jane Hughes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I call upon Dacorum Borough Council to:</p> <p>Halt the Local Plan Consultation  Redraw the plan based on the recent housing densities achieved  Demand that housing targets are based on up to date estimates</p> <p>The Dacorum Local Plan Emerging Strategy for Growth (2020-2038):</p> <p>Has too many of the wrong houses in the wrong places</p> <p>Wastes acres of farmland and countryside and damages the setting of the Chilterns Area of Outstanding Natural Beauty.</p> <p>It plans for too many houses where there are too few local jobs, making commuting worse and increasing traffic pollution.</p> <p>It will overload local facilities.</p> <p>Please listen to local voices.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8616
<b>Person ID</b>	1266595
<b>Full Name</b>	SHARON MACARTHUR-POWELL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes

<b>Spatial Strategy for Growth comment</b>	<p>2/ Do you have any specific comments about the sustainable development strategy?</p> <p>—The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.</p> <p>— This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.</p> <p>— Northchurch has not been recognised at all. It has been called West Berkhamsted instead.</p> <p>— The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.</p> <p>— There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8618
<b>Person ID</b>	1266595
<b>Full Name</b>	SHARON MACARTHUR-POWELL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>— Too much of the housing proposed in Northchurch is at the top of steep hills, far from the train station or employment in Berkhamsted. These sites are therefore highly likely to attract two car families, as journeys to shops, work and doctors' appointments will require cars. This is not sustainable and does not take account of the responsibility to address climate change.</p> <p>— The policies do not take into account the impact of the Covid pandemic. 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.</p> <p>— 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.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8626
<b>Person ID</b>	1266604
<b>Full Name</b>	SEB BELOE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>2/ Do you have any specific comments about the sustainable development strategy?</p> <p>—The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.</p> <p>— This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.</p> <p>— Northchurch has not been recognised at all. It has been called West Berkhamsted instead.</p> <p>— The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.</p> <p>— There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8638
<b>Person ID</b>	1266607
<b>Full Name</b>	RACHEL POWELL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>2/ Do you have any specific comments about the sustainable development strategy?</p> <p>—The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.</p> <p>— This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.</p> <p>— Northchurch has not been recognised at all. It has been called West Berkhamsted instead.</p> <p>— The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.</p> <p>— There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8640
<b>Person ID</b>	1266607
<b>Full Name</b>	RACHEL POWELL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>4/ Do you have any specific comments about any of the delivery strategies?</p> <p>—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8675
<b>Person ID</b>	1207333
<b>Full Name</b>	Growth Team
<b>Organisation Details</b>	Growth team Hertfordshire County Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><b>Paragraph 5.7</b></p> <p><u>Transport</u>. The county council supports the approach in transport terms, regarding the avoidance of significant developments to the smaller villages and wider countryside. As public transport is raised here as critical to sustainable transport, the most significant concern is in relation to the development sites proposed in south and west Berkhamsted. They are remote from existing bus services and it is difficult to see, if these sites come forward in the usual manner, how adequate service improvements could come forward. Therefore, it is difficult to see how these sites can be made as sustainable as possible. HCC would welcome further discussion and development of a strategy and policy to ensure all new development sites have good accessibility to public transport so it is a real choice for the journeys people make and want to make.</p> <p>In that context, a number of the development sites also mention the need for pedestrian and cycle improvements, but not public transport improvements. Additional general wording stating the need for bus infrastructure and service improvements should be added in order to ensure that it is clear that these things will need to be delivered to make sites</p> <p><b>Policy SP2: Spatial Strategy for Growth</b></p> <p><u>Transport</u>. The county council welcomes that the majority of new growth and investment will be concentrated in sustainable locations such as in Hemel This will encourage the use of sustainable modes of transport. With this in mind, HCC would like to see more emphasis placed on sustainable transport enhancements and improvements to connectivity within and surrounding Hemel Hempstead as this aligns with the policies in HCC's LTP4 and the text should be updated accordingly to reflect this.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8689
<b>Person ID</b>	1266699
<b>Full Name</b>	Ms Carleen Bircham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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>Whilst I support the need to increase housing, this needs to be done in a sustainable way and to preserve the greenbelt. The plans to increase housing in the area by 16,600 new homes is completely excessive to what the projected need is. The latest ONS data available projects 6051 new homes by 2038 - 64% fewer than this plan projects. I therefore object to the proposed plans and would like this email put forward to the decisions board.</p> <p>There is already a high demand for services such as traffic needs, schools and healthcare in the Dacorum area. The plan does not commit to any level of sustainability in its sustainability targets.</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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8693
<b>Person ID</b>	1266704
<b>Full Name</b>	Ms Dawn Foster

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	NO to the South Berkhamsted concept!! I am a resident in Little Gaddesden and object to these plans for green belt land.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8716
<b>Person ID</b>	1266740
<b>Full Name</b>	HAZEL MEDCALF
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I urge you to STOP this consultation now while people are unable to attend meetings to put forward views and ask questions.</p> <p>I am not an articulate campaigner, but I feel very strongly about the proposed loss of precious green belt land for the huge number of houses planned.</p> <p>This will completely destroy the area and community.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS8730
<b>Person ID</b>	1207811
<b>Full Name</b>	Helen Hadfield
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I would like to start by noting how difficult and time consuming it is to attempt to respond via your portal. This really should be simplified with lay people in mind.</p> <p>I am writing to note my objections to the local plan, the main one being that the number of homes planned is ridiculously high. Even without the buffer figures, 16,596 homes over the next 18 years, or 922 per year is a phenomenal number, this is twice the level of building this area has ever seen.</p> <p>The calculation of this number appears to be based on outdated models and should be updated to give a more realistic target, especially in light of the huge and long lasting changes to work and living that COVID and Brexit have brought about.</p> <p>Working remotely has become the norm and many companies have shut down their offices and/or moved to smaller premises which indicates that this change won't be short lived. We could easily end up with areas and communities ruined for the sake of housing that is unneeded, unwanted and totally inappropriate for the way people live.</p> <p>Even if this weren't the case, the current plan does not really address the need for affordable family housing in the area. Giving mandatory numbers will encourage developers to throw up small flats totally unsuitable for the needs of residents.</p> <p>The loss of green belt land is particularly concerning as once gone it is gone forever. I don't believe the current circumstances meet the criteria of 'exceptional circumstances' which should be the only reason to release designated green belt land for development. Losing such large swathes will seriously impact the environment and habitats.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8755
<b>Person ID</b>	1266763
<b>Full Name</b>	CERI BESENT

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing</li> <li>- Failure to address climate emergency issues</li> <li>- Impact on infrastructure and local community</li> <li>- Likely water and water waste disposal issues and damage to chalk streams</li> <li>- The lack of brownfield regeneration proposals.</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> <li>- 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.</li> </ul> <p>I also think the number of houses being proposed for this area has been vastly over estimated.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8765
<b>Person ID</b>	1266769
<b>Full Name</b>	LISA AND TRISTAN ROBINSON
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to object to the plan to build additional houses in Dacorum including Northchurch and Tring.</p> <p>My reasons for objecting to this are:</p> <ul style="list-style-type: none"> <li>- Too many houses proposed</li> <li>- negative Impact on traffic, with some smaller lanes and roads that will be overloaded and physically changed to due to this</li> <li>- negative impact on infrastructure including too many people on trains into London</li> <li>- negative impact on Greenbelt, including wildlife and canal (lockfield site)</li> <li>- negative impact on schools, primary and secondary intake</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8768
<b>Person ID</b>	865182
<b>Full Name</b>	Mrs Diana Lai
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Instinctively, I oppose the destruction of our precious and beautiful Green Belt land which is so important, both physically and mentally, for the residents of the borough as well as vital for our beleaguered wildlife whose habitats are alarmingly becoming increasingly degraded or disappearing altogether!</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8771
<b>Person ID</b>	1266775
<b>Full Name</b>	Tim Waldram
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8784
<b>Person ID</b>	1266785

<b>Full Name</b>	Anthony Sutton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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. 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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8803
<b>Person ID</b>	1266789
<b>Full Name</b>	Mr and Mrs Jenkins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Spatial Strategy for Growth comment</b>	<p>If the latest figures were accepted it would result in a reduction in the annual housing target and help to reduce the 922 per annum figure in Dacorum’s draft Local Plan. The previous Local Plan housing target was set at 430; the current draft Local Plan target will result in a level of growth that can only be achieved with significant development of the Green Belt and this will be higher than previous Dacorum achievements and furthermore we believe cannot be sustained.</p> <p>The current national housing targets are too high and there needs to be a more even distribution with less emphasis on London and the Home Counties. The current housing target (subsequently increased to 1,023 per annum) generated by standard housing methodologies produces a figure well in excess of the Office of National Statistics projection of housing need based on their latest (2018) figures.</p> <p>Failure to meet the Government’s targets will mean Dacorum being penalised under the Housing Delivery Test for <i>housebuilders’ failures</i> to build enough homes, by being forced to release more Green Belt land for development. The more developers miss the Council’s housing target, the more land Dacorum will be forced to release for development. A lower, more realistic target is far more likely to be achieved and consequently negate any demand to release further Green Belt land in the Borough. However, developers should be equally concerned that forcing the Borough to release more land for development will have a long-term, negative impact on their relations with the Council, which should be avoided.</p> <p>The Borough’s current reliance on Green Belt development to achieve its targets also runs counter to the Government’s response to the local housing need proposals set out on 16th December 2020 in which it stated “... <i>that 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</i>”. The Campaign for Rural England (CPRE) have also consistently pointed out that housing developments on Green Belt are invariably too expensive for those looking for a first home and do nothing to address the needs of younger people and families trying to put a roof over their heads.</p> <p>Therefore, Green Belt development will do nothing to address the Borough’s housing needs. It will also undermine one of the aims of the latest version of the Kings Langley draft Neighbourhood Plan (January 2021), namely “Providing homes in the parish that are financially accessible to younger people, especially young families and those stepping onto the property ladder for the first time”.</p> <p>If unrealistically high local housing targets are intended to increase the supply of housing for young people, the question needs to be asked as to how inflated house prices on Green Belt sites will help achieve this? We believe it will not.</p> <p>Similarly, what chance have Dacorum of meeting the commitment made at their Council meeting in January 2021 “to build on the positive work of previous years and continue work directly to develop homes for social rent and to seek further opportunities with partner registered providers to accelerate the delivery of new social rent homes”. Developers will clearly be unwilling to increase the proportion of social rent housing on land where they have been obliged to pay a premium.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8810
<b>Person ID</b>	1158356
<b>Full Name</b>	Colin Blundel
<b>Organisation Details</b>	Planning Officer Chiltern Society
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Policy SP2 – The proposed housing target of 16,596 (922 per annum) is excessively high and, in particular, the increases in housing at Tring and Berkhamsted would have significant impacts on the character of those towns, as well as destroying significant areas of Green Belt. In view of the proposed changes to the planning system and the methodology for assessing housing needs, the Council must seek to reduce these numbers. This would be consistent with the Government’s ‘levelling up’ agenda, reducing housing in the south east and increasing housing in the north. In a borough with the majority of the area designated as Green Belt or AONB there must be scope to reduce the housing numbers. The Government has yet to publicise how the methodology could be amended to allow for this. As it stands, the Borough has a higher housing target than some of the cities in the north. In an area with national designations and aspirations to become a National Park, this cannot be acceptable.</p> <p>Bullet point 1d seeks to create additional retail floorspace. At the present time, the long-term impacts of Covid-19 on the retail industry are unclear, but with online shopping increasing further units may not be required. We suggest this is reviewed at the next stage in the plan process and some of the sites could potentially be considered for housing in the urban areas.</p> <p>7.5 – 7.6 – The annual target of 922 homes is excessively high when compared to the 433 required in the previous Local Plan. In such a highly constrained district, this increase is not achievable without significant loss to the Green Belt and open space in and around the towns. This number must be reviewed when the Government decides how to take forward its proposed planning reforms. If the numbers can be significantly reduced, then most of the proposed Green Belt sites could be taken out of the Plan and housing development more concentrated within the urban areas. If the Green Belt sites are not required to meet reduced housing numbers, then exceptional circumstances would be unlikely to exist to remove land from the Green Belt. We would expect this issue to be addressed in detail in drawing up the next version of the Local Plan.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8838
<b>Person ID</b>	1207905
<b>Full Name</b>	Patricia Munn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>As residents of Dacorum (Felden) we have the following observations on the local plan.</p> <p>We recognise the need for increased housing and are not unsympathetic to the challenge faced by Dacorum Borough Council (DBC). A number of the proposed areas for development are clearly appropriate. However our overriding concerns are:</p> <ol style="list-style-type: none"> <li>1 a) to avoid the redesignation for development of any land that is currently designated as Green Belt</li> <li>2 B) preferentially to use brownfield sites and to avoid utilisation of undeveloped land even if not currently designated as Green Belt</li> <li>3 C) to ensure development is consistent with the surrounding area in particular avoiding high rise developments. Particular care must be taken to protect and enhance the areas adjacent to Boxmoor Trust land. The Kodak Tower has been refurbished but was and remains an eye sore. This mistake must not be repeated.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8842
<b>Person ID</b>	1266791
<b>Full Name</b>	Robert Munn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>As residents of Dacorum (Felden) we have the following observations on the local plan.</p> <p>We recognise the need for increased housing and are not unsympathetic to the challenge faced by Dacorum Borough Council (DBC). A number of the proposed areas for development are clearly appropriate. However our overriding concerns are:</p> <ol style="list-style-type: none"> <li>1 a) to avoid the redesignation for development of any land that is currently designated as Green Belt</li> <li>2 B) preferentially to use brownfield sites and to avoid utilisation of undeveloped land even if not currently designated as Green Belt</li> <li>3 C) to ensure development is consistent with the surrounding area in particular avoiding high rise developments. Particular care must be taken to protect and enhance the areas adjacent to Boxmoor Trust land. The Kodak Tower has been refurbished but was and remains an eye sore. This mistake must not be repeated.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8874
<b>Person ID</b>	1266815
<b>Full Name</b>	Roger Wright
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I would like to strongly oppose the number of new houses being proposed in Dacorum in the proposed local plan.</p> <p>In particular I strongly oppose the loss of Green belt land to allow for the proposed developments.</p> <p>The implications for traffic through Potten End do not bear thinking about and the lack of proposed provision of new schools, doctors surgeries and hospitals is unacceptable!!</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8879
<b>Person ID</b>	1145563
<b>Full Name</b>	Mr Richard White
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	In essence the plan seeks to meet an arbitrary and excessive housing target allegedly decreed by central government. There is no attempt to justify this number.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8880
<b>Person ID</b>	1262380
<b>Full Name</b>	PAT HOWE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	These new plans cannot go ahead, it will completely distort the town, we need to rebuild the town after this virus and I don't think by just building all out of the town and in fact making it worse. Let's get the council working with the residents. Please.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8884
<b>Person ID</b>	1145647
<b>Full Name</b>	Mr Richard Sidwell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I am writing with regard to the outdated planning proposals of your Local Plan and the need to understand the already stretched resources of the local area.</p> <p>I'm a resident of Kings Langley and have witnessed the terrible traffic jams, dangerous parking(in particular Red Lion Lane) due to over development, and inadequate consideration of brown field sites when considering new housing this threatening development of irreplaceable green belt land. The huge increase in people working from home will surely lead to an increase of unused commercial buildings which could be converted and reused as residential development.</p> <p>The conjoining of towns through development of such areas as Rectory Farm is against government guidelines. The recent terrible lockdown and pandemic has seen an exponential use of, and appreciation and need for, green spaces such as Wayside Farm and surrounding fields.</p> <p>We must do everything we can to protect our open spaces not just for ourselves, but for future generations, for helping keep our air clean, and also for our wildlife. The over burden on water supplies must also be considered as the chalk aquifers which could be exploited, are a desperately important natural resource(Natural Environment and Rural Communities Act 2006), which though invisible to our everyday lives, are paramount to the well being of what we do see around us.</p> <p>I hope you take these matters incredibly seriously. You are the guardians of our local environment and communities and must do everything in your power to protect, and not exploit them.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8885
<b>Person ID</b>	1266824

<b>Full Name</b>	Linda Ralphs
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>As a resident of Dacorum for the past 29 years, I have watched with distress as our standard of living in this town has gone down as the population increases without the necessary increase in services, notably provision of basic medical care and water pressure.</p> <p>In response to the draft local plan entitled 'Dacorum, Local Plan 2020-2038 Emergency Strategy for Growth Consultation' I would like to register my objections as follows:</p> <ul style="list-style-type: none"> <li>— I object to the proposals in the consultation because the proposals to build on the green belt are wrong.</li> <li>— I understand that there needs to be proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown</li> <li>— The needs of local people have not been prioritised over the needs of developers</li> <li>— There has not been enough scrutiny of brown field sites</li> <li>— CV19 has changed behaviour meaning more town centre development is possible - this has not been taken into account</li> <li>— There are too many houses, yet not enough social and affordable housing - we should be building the right houses in the right places for local people - not giving a green light to urban sprawl</li> <li>— Not enough care has been taken to protect the local ecology - the demand for water will damage the aquifer and the internationally recognised chalk streams</li> <li>— The plans are not carbon neutral and conflict with commitments to tackle climate change</li> <li>— The houses proposed will encourage people to use cars as they are not near employment or transport hubs.</li> <li>— The increased populations in Tring and Berkhamsted will mean more traffic travelling along Northchurch High Street, leading to congestion, increased pollution, health problems, road safety concerns — this will be bad for the mental and physical health of our residents and future generations.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS8893
<b>Person ID</b>	1266831
<b>Full Name</b>	Elizabeth Glasser
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>The consultation period commenced from 27th November until today. I do not read social media or buy a local paper so was unaware of the consultation period until some groups leafleted my home and I received a document through the door from Dacorum BC in the last few weeks.</p> <p>Much has changed in the world let alone the area covering Dacorum, since the Plan was drawn up. I feel it is impossible to comment on a plan that does not now take into account the effect of the Brexit Deal the Government secured at the end of December 2020. Before this date we had no idea what we would secure and how this would affect us all over the coming years. By the middle of February 2020 I realised what was happening in Italy would eventually affect us. None of us knew then to what degree and how it would re-shape the way we live our lives in the future. On the 16th December 2020 the Housing Minister, Robert Jenrick revised the housing numbers algorithm, placing the emphasis on growth and investment in the North and the Midlands, as it prepares to launch a revised planning formula for calculating housing need. The government said it was sticking to the target of building 300,000 homes a year, but it would now be prioritising brownfield sites and urban areas.</p> <p>As a resident of Tring, I cannot see how your outdated plan is fit for purpose in March 2021 taking the above into consideration.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8894
<b>Person ID</b>	1266833
<b>Full Name</b>	Sara Williams
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to let you know that I am extremely concerned about the proposed housing developments contained in the 'Dacorum Borough Council Emerging Strategy for Growth' and the irreparable negative impact that this will have on our local community and the environment. I would like to register my objection to these plans.</p> <p>I understand that there is a need for housing, particularly affordable homes, however, I am particularly concerned about the following:</p> <p>Congestion/pollution - The year-on-year increase of houses on the proposed Green Belt sites and the distance from the towns will mean home owners will have to use their car to either get into town or to the station. The centres of Berkhamsted and Tring are already heavily congested and polluted at peak times. The negative impact of pollution caused by car emissions is well documented (A study Kings College Hospital in 2018 estimates that air pollution has been responsible for causing up to 36,000 deaths per year).</p> <p>Building on Green Belt - nearly all the development is on Green Belt and the council has ignored national planning policy contained in NPPF and statements by ministers that Green Belt should not be developed 'except in exceptional circumstances' -the COVID pandemic has confirmed that people need green spaces for mental and physical wellbeing. DBC should not be taking the easy option of building on Green Belt and should look at further Brownfield sites to protect our countryside.</p> <p>Number of houses - DBC should challenge the proposed housing numbers dictated by central government rather than just accept them. The council are using outdated housing projections from 2014 (Pre-COVID, pre-Brexit and pre-HS2). The number of houses needed should be based on a new evaluation. The plan is also at odds with the recent government statements to address the balance between north south divide. COVID has demonstrated that people can and will work from home in the future - there is no need to live within striking distance of London anymore.</p> <p>This is an opportunity for DBC to be seen as imaginative, forward-thinking and to come up with a truly sustainable and environmentally considerate plan that will benefit future generations. However, this plan takes the easy option to just concrete over Greenbelt that benefits the developers rather than the local community. Health and well-being are paramount and this local plan will make life worse for everyone and will push Berkhamsted and Tring beyond their limits.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8909
<b>Person ID</b>	1266846

<b>Full Name</b>	Carla Michalik
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8912
<b>Person ID</b>	1266848
<b>Full Name</b>	Steven Hart
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8915
<b>Person ID</b>	1266849
<b>Full Name</b>	Francis Morris
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	

**Spatial Strategy for Growth 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.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8916
<b>Person ID</b>	1266850
<b>Full Name</b>	Ellis Hughes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	

**Spatial Strategy for Growth 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.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8941
<b>Person ID</b>	1266875
<b>Full Name</b>	PERKS EMILY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>It is extraordinary thought that as we enter the 2021 it is being suggested that we can build on green belt. This is shocking. The effect of the environment when as a population we should be doing everything we can to preserve our natural environment. I understand the need for new houses but these should be on brownfield sites. I believe that this is being done for maximum profit. A developer can build far more cheaply on a greenfield site and in Berkhamsted will then sell the house for 5 times as much as anywhere else. I do not believe that this proposal is for the benefit of local people who still will not be able to afford this new house.</p> <p>My general comments about building on greenbelt land and the environmental impact also apply to Tring.</p> <p>As we come to a very unsettled year post COVID we have seen a huge change in people working from home, with many firms considering no longer having commercial office. It has been widely reported that this will leave many commercial spaces empty. It is imperative that we use these empty resources before we develop on a greenbelt site.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8946
<b>Person ID</b>	1266882
<b>Full Name</b>	AMANDA BOWDEN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am emailing you to express my objection to the proposed development outlined in Dacorum Borough Council's document entitled "Emerging Strategy for Growth (2020 – 2038)".</p> <p>As a resident, I implore DBC to reconsider this plan which imposes massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt. Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily.</p> <p>The following are my principal objections:</p>

- 1 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.
- 1 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.
- 1 Impact on infrastructure. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing. It ignores issues such as traffic congestion, education provision and healthcare requirements.
- 1 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8951
<b>Person ID</b>	1266886
<b>Full Name</b>	SIMON WEIGHTMAN AND DEBBI FIGUEIREDO
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* <b>Yes</b>	
* <b>No</b>	

<b>Spatial Strategy for Growth comment</b>	<p>We say no, your plans are flawed, the figures for the projected number of houses is wrong and our green belt is far more precious to us than has been valued by the government model.</p> <p>No more development without proper consultation with local communities and working to a more sustainable future not led by cars and commuting into London.</p> <p>Our local infrastructure cannot support more housing. There are insufficient water supplies, the sewers can't cope. There's not enough access to healthcare or education. Public transport is poor.</p> <p>Back to the drawing board.</p> <p>We say no, not in our name.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8954
<b>Person ID</b>	1266888
<b>Full Name</b>	MEGAN OWEN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am emailing you with my objection to the proposed development outlined in Dacorum Borough Council's document entitled "Emerging Strategy for Growth (2020 – 2038).</p> <p>As a resident, I ask DBC to reconsider the plan which imposes massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt and our status as an AONB (in fact the 2019</p>

Glover report recommended that the Chilterns should be given National Park Status). Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily.

The following are my principal objections:

1 Over development of PROTECTED green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs. How can it be acceptable to build houses on an area protected from development. What exactly is the point of assigning areas to green belt and then just throwing up houses on them and in doing so destroying areas that promote wildlife, destroying much needed farmland and destroying natural heritage.

2 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.

3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.

4 Impact on infrastructure. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing. It ignores issues such as traffic congestion, which again does not take into consideration climate issues, education provision and healthcare requirements. This town cannot accommodate such growth in population. The schools in Berkhamsted are already oversubscribed, not even taking into consideration the new houses already being developed off Shootersway.

5 Water supply and waste water. The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's three chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. In addition the proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion. If this is not addressed potential pollution of watercourses, especially in times of storm, is extremely likely.

6 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.

I request that the above points are taken into very serious consideration.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8956

**Person ID** 222676

**Full Name** Mrs Carolyn Hill

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Finally, , 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** Spatial Strategy for Growth

**ID** EGS8965

**Person ID** 1266893

<b>Full Name</b>	PENNY HARRISON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock. 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 simplistic 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 than this plan projects.</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).</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8967
<b>Person ID</b>	1266893
<b>Full Name</b>	PENNY HARRISON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>Spatial Strategy for Growth comment</b>	I Call for: <ul style="list-style-type: none"> <li>The number of new houses proposed in the plan to be substantially reduced.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8974
<b>Person ID</b>	1266925
<b>Full Name</b>	Ms Sarah Edwards
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<b>The local housing plan is flawed</b> since it is based on <b>outdated housing projections</b> . I can appreciate the huge amount of work needed to produce the plan, however: <ul style="list-style-type: none"> <li>Using the more recent data, produced by the ONS in 2018, would show that far fewer houses would be needed.</li> <li>Time is needed to assess the impact of the last 12 months on housing projections due to the potential long-term change in work patterns and commutes and therefore the need for housing in certain locations. Empty retail and business units can be re-allocated to residential use.</li> <li>DBC need to challenge the proposed housing numbers</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8982
<b>Person ID</b>	1266932
<b>Full Name</b>	Ms Sharon Noonan
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I object to this. We say NO
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS8983
<b>Person ID</b>	1266934
<b>Full Name</b>	Ms Sharon Mattingly
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express considerable concern and to formally object to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth. The detrimental impact on the environment and infrastructure, including traffic levels, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>The scale of the proposed increases in the number of houses to be built is excessive and goes beyond the most up-to-date ONS projections. The plans are based on 2014 ONS numbers which are now outdated. I believe that the plans should have been withdrawn and reconsidered in the light of this new data, as has been called for by many.</p> <p>In addition, I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>the impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns</li> </ul>

- impact on Beechwoods Special Area of Conservation
- failure to address climate emergency issues – in particular, the Plan will not deliver legal commitments related to environmental protection and addressing climate change
- impact on infrastructure and quality of life for the local community who will suffer the impacts of traffic congestion, further decreases in air quality, and severe pressure on local services, facilities and green space
- likely water and water waste disposal issues and damage to chalk streams
- the lack of brownfield regeneration proposals
- lack of true affordable housing and social inclusion measures
- the conflict 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.

This Plan should be withdrawn and revised using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the strategy. It is vital that new development is planned intelligently and with an eye to the real challenges of the future

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8985

**Person ID** 1266940

**Full Name** Ms Janet English

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I wish to register my strong objection to the New Dacorum Local Plan (to 2038).  
I object on the following grounds:

. Building on green belt

- . Too much additional pressure on already overloaded local infrastructure, oversubscribed schools and traffic.
- . Number of proposed houses is excessive and well above ONS's calculation of the forecasted housing need for Dacorum.
- . The impact on West Berkhamsted is disproportionate and does not take into account the recent major developments which have already occurred in the area (Bearroc),
- . It will have an unacceptable negative impact on pollution levels, road safety, local ecology and the health and wellbeing of the local residents.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS8997

**Person ID** 1266969

**Full Name** Ms Olivia Roberts

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9000

**Person ID** 1266975

**Full Name** Mr Norman Groves

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

In summary I can say I am appalled at the frighteningly ballooning size of the District in general and Berkhamsted in particular which would result from implementing the proposals in the Emerging Strategy for Growth.

The proposals are not justified by the evidence of need, and are ill-balanced, with massive tracts of housing unsupported by compensating investment in all the services that make life bearable - traffic and mobility infrastructure, and public services that need to be embedded where people live.

The calculations of housing need have been made based on out of date demographic information and by using poor housing need algorithms and should be revised in line with the latest evidence, which show a smaller need. This will be even more the case as the pandemic changes the nature of the location of work and living patterns.

The proposals mean a vast and unnecessary take is made of Green Belt land, and this will be very damaging to the amenity and environment for Berkhamsted and for the Area of Outstanding Beauty. The scale of development should be severely reduced to reflect the importance of maintaining the quality of the Green Belt and AONB.

The volume of housing and sites that result (at an additional 35% in Berkhamsted) is a massive overdevelopment, and ill balanced by investment in infrastructure, such as water supply and waste disposal, and community amenities.

The proposals will robustly advance the day when continuous ribbon development is experienced from Watford to the other side of Berkhamsted.

The Government has made clear there is **NO justification** to more than very limited housing and population growth if otherwise it does irretrievable damage to the jewel of British environmental policy making, the Green Belt. There is never a time when it is heroic to destroy the quality of life for a vast number of residents in the Borough.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9019

**Person ID** 1267011

**Full Name** Mr Louis Quail

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Housing numbers**

- 24% increase in housing proposed in Berkhamsted (more than 900 houses) 50% increase proposed in Tring
- Council using outdated (2014) housing projections. Half of this number needed in reality (using more recent ONS data from 2018).

- DBC *should* challenge the proposed housing numbers – which are dictated by central Government, rather than just accept them.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9020

**Person ID** 1267011

**Full Name** Mr Louis Quail

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Housing distribution**

- Hemel, Berkhamsted and Tring are all expected to take their ‘fair share’ of housing proposed. Each of these settlements have their own issues and constraints (topography-how hilly it is/valley, congestions, lack of public transport, lack of safe cycle ways, etc.) However, DBC seems to just be looking at the numbers – and not taking these vital issues into account.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9031

**Person ID** 1261973

**Full Name** Norman Nicholls

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

Yes / No * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We have been residents in Berkhamsted for over 40 years and take this opportunity to give our views on future building plans in Dacorum.</p> <ul style="list-style-type: none"> <li>The target for new home build in the Draft Plan is over 100% increase on the current Plan - which is far too high and should be scaled down considerably.</li> <li>About one-third of the new homes are planned to be built on Green Belt land which goes against all the good reasons why it should stay "Green Belt" and is against government advice. <b>Green Belt land should not be developed and if the new build targets are scaled down this will not be necessary.</b> The green belt land around Berkhamsted and Tring is a precious commodity and once taken can never be replaced. You can be sure that all residents will not want to lose this land and their voice must count above all others. The planned green belt building around Berkhamsted is especially high and there can be no justification for this unnecessary land-grab. Land in Berkhamsted is of very high value and developers can make large profits off any new build and we suspect that financial gain is behind many of these planned new builds - which is totally the wrong motivation. Taking care of current residents and the environment should be the top priority - with any new build sympathetically added to the community without wasting green belt land.</li> <li>New build growth should also come with improvements to the local infrastructure as a higher local population without better infrastructure would result in a deterioration of local standards e.g roads, utilities, education, doctors, dentists etc</li> </ul> <p>In summary our view is that the Draft Plan does a great disservice to the Dacorum community. The new build targets are too high and by scaling them down we can remove the planned new homes on green belt land that should be protected at all costs.</p> <p>New homes should go hand in hand with necessary infrastructure improvements.</p> <p>Developers are probably putting pressure on Dacorum Council because new homes produce big profits for them and this pressure to build more than the current plan should be resisted and the current lifestyle/environment and green belt benefits of local residents (who are the key players here) should be looked after and protected and not sacrificed in an overly ambitious and profitable land grab.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9032
<b>Person ID</b>	1267021
<b>Full Name</b>	Mrs Helen Nicholls
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We have been residents in Berkhamsted for over 40 years and take this opportunity to give our views on future building plans in Dacorum.</p> <ul style="list-style-type: none"> <li>The target for new home build in the Draft Plan is over 100% increase on the current Plan - which is far too high and should be scaled down considerably.</li> <li>About one-third of the new homes are planned to be built on Green Belt land which goes against all the good reasons why it should stay "Green Belt" and is against government advice. <b>Green Belt land should not be developed and if the new build targets are scaled down this will not be necessary.</b> The green belt land around Berkhamsted and Tring is a precious commodity and once taken can never be replaced. You can be sure that all residents will not want to lose this land and their voice must count above all others. The planned green belt building around Berkhamsted is especially high and there can be no justification for this unnecessary land-grab. Land in Berkhamsted is of very high value and developers can make large profits off any new build and we suspect that financial gain is behind many of these planned new builds - which is totally the wrong motivation. Taking care of current residents and the environment should be the top priority - with any new build sympathetically added to the community without wasting green belt land.</li> <li>New build growth should also come with improvements to the local infrastructure as a higher local population without better infrastructure would result in a deterioration of local standards e.g roads, utilities, education, doctors, dentists etc</li> </ul> <p>In summary our view is that the Draft Plan does a great disservice to the Dacorum community. The new build targets are too high and by scaling them down we can remove the planned new homes on green belt land that should be protected at all costs.</p> <p>New homes should go hand in hand with necessary infrastructure improvements.</p> <p>Developers are probably putting pressure on Dacorum Council because new homes produce big profits for them and this pressure to build more than the current plan should be resisted and the current lifestyle/environment and green belt benefits of local residents (who are the key players here) should be looked after and protected and not sacrificed in an overly ambitious and profitable land grab.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9034

<b>Person ID</b>	1267025
<b>Full Name</b>	Mr Paul Harris
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The housing numbers proposed in the Dacorum Local Plan are completely unsustainable. The South East of England which includes Dacorum is the most densely populated part of the British Isles, as well as being the driest part. Where are the water supplies for a large increase in population to come from, especially at a time of increasing volatile weather patterns because of climate change. These ideas of such a population expansion make a mockery of a zero-carbon economy and would lead to a large increase in pollution caused by increased traffic movements and other factors. According to council sources only one third of the housing increase would lead to an encroachment into the Green Belt. If that is the case why not lower the proposed increase and give maximum protection to the Green Belt. Green Belt land is essential for the physical and mental well being of the people of Dacorum. Proposed plans for building up to the boundary of the Chilterns Area of Outstanding Natural Beauty shows a complete lack of respect for the beauty of the natural landscape and for the people who live in the area and for those who visit. Lastly who are these houses for? Would they be built for those who really need them such as people on low income? If they are not then this seems to me like a ploy for people to make money for example, Developers, Land Owners and maybe second homes for some. What Dacorum and other parts of the country need is for a majority of new build houses to be social but I can appreciate this goes against the prevailing economic ideology.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9035
<b>Person ID</b>	1267028
<b>Full Name</b>	Ms Julie O'Sullivan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<ol style="list-style-type: none"> <li>1 The housing plan for Dacorum is excessive, representing as it does an increase of over 25% (16,600 homes against a current stock of just short of 60,000, according to your own website. This is ahead of the requirement for additional homes in the borough as forecast by the ONS.</li> <li>2 These forecasts in themselves were made prior to the UK leaving the European Union. It is estimated that 1.3 million people born outside the UK have already left, an exodus that will disproportionately affect London and the South East.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9047
<b>Person ID</b>	399841
<b>Full Name</b>	Mrs Gillian Lumb
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I would like to comment on the Plan out for consultation making the following points:</p> <ol style="list-style-type: none"> <li>1 GENERAL COMMENTS. I do not agree that Dacorum needs to build so many dwellings:- <ul style="list-style-type: none"> <li>• The South East is over developed at the expense of the North.</li> <li>• The countryside should be accessible to all. Building over it makes nature less available to Londoners who need to travel to enjoy our local areas of outstanding natural beauty.</li> <li>• Government policy is to protect the Green Belt we are told.</li> </ul> </li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS9049
<b>Person ID</b>	1267060
<b>Full Name</b>	HELEN EVANS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS9052
<b>Person ID</b>	1267061
<b>Full Name</b>	LAURA SPRINGATE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS9055
<b>Person ID</b>	1267063
<b>Full Name</b>	ANN CONROY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>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.</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. 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 &amp; 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9066
<b>Person ID</b>	1267066
<b>Full Name</b>	Joanne Freedman
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	1) The wholesale release of precious greenbelt sites is not justifiable. By this I refer to the overall housing target. 16,899 is a figure far in excess of 2018 ONS predicted requirement for the area, far higher than our current level of building and even more out of scope with the Borough's infrastructure to accommodate. It is difficult to objectively consider releasing greenbelt protection when there is no justifiable need. The absurd situation where no current councillor or council officer can justify the need other than to say it complies with a government policy is made even worse when that same government flips and U-turns on major policies several times a week. I accept that to deliver a satisfactory home to everyone in the country will require some building on undeveloped land, but I do not believe we need to build this amount of homes in this area in this space of time. This is evidenced by the amount of new homes and retirement units built in Berkhamsted over several years that still sit vacant - because they are out of the price range of most local people to purchase.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9070
<b>Person ID</b>	1267067
<b>Full Name</b>	KATHRYN BROWN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Spatial Strategy for Growth: 80% of the 2200 homes to be built in Berkhamsted will be on Green Belt land. The numbers suggested by the Governments Standard Methodology are not a target, and should not be treated as such. Especially at the cost of Green Belt.</p> <p>Berkhamsted's historic character and market town nature have not been taken into account. By increasing the number of houses by 24% the amount of traffic using the High St and central road system will increase hugely.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9081
<b>Person ID</b>	1267071
<b>Full Name</b>	JILL JONES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I would like to respond to the planning proposals for the Dacorum area.</p> <p>I strongly feel that these developments will be detrimental to the environment, particularly in the cases of Berkhamsted and Tring.</p> <p>Berkhamsted is already spoilt by traffic congestion and parking problems. Tring will be the same if these plans go ahead. These are small market towns with distinctive characters, both of which will be completely spoilt by over development.</p> <p>I also have a problem with any building developments on green belt land. Surely it is in our best interest to protect these areas. How long will it be before Tring becomes a suburb of Aylesbury?</p> <p>I realise that we have a shortage of housing stock, but there must be better places to develop than around small towns and villages which do not have the infrastructure to support large developments where the risk is to ruin the environment for all concerned.</p> <p>I am not a resident of any of the areas to be significantly affected, but nevertheless feel that the issue is too important to be ignored.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9083
<b>Person ID</b>	1146072

<b>Full Name</b>	Helen Cole
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	On the plan itself I also have some objections. At the top level this plan was devised before the recent government changes to planning guidance and does not seem to have been amended as a result. As part of the 'levelling up agenda' we should be looking at developing more places to live and work in the North of the country rather than further developing the already overcrowded South East. Secondly it does not take into account changes in lifestyles as a result of the pandemic. It is very likely that more people will be spending at least part of the week working from home in the future, rather than commuting every day, and therefore proposed housing density should be reduced to allow people the space they need. We know that people are valuing garden space more now than in the past, and yet this plan agrees to an increase in permitted housing density. This will result in developers building houses that do not properly meet people's needs.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9092
<b>Person ID</b>	1267074
<b>Full Name</b>	Joanne Howe
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt

releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9108

**Person ID** 1174481

**Full Name** Mr & Mrs Ostle

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Green belt; The proposal to overthrow current Green Belt and adjacent AONB land and use it for development is completely at odds with the Government and Public policy, and Local wishes, of sustaining and where practical improving, the Environment for future generations. Those houses that really are proven to be required should be located only on Brownfield or where there is existing development. The current Government Policy on Greenbelt is at clear and demonstrable odds with its other stated objectives and as such should not be unquestionably followed.

Review of housing requirements; Should the review of requirements really identify that there is, and will be, a requirement of the size currently envisaged the Establishment of a new Garden City or equivalent elsewhere in Hertfordshire, with purpose built road and rail connections would facilitate the design and layout of an optimum housing and infrastructure, could minimise pollution and other environmental issues.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9120

**Person ID** 1267084

**Full Name** Mark Grego

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I wish to register my objection to the draft local plan on the following basis:</p> <ol style="list-style-type: none"> <li>1 It is based on ONS data from 2014 as opposed to 2018. Algorithms have their place but should not be relied upon to produce beneficial outcomes. The growth is required as the government wishes to increase the London commuter belt rather than being a response to local needs.</li> <li>1 The proposed growth areas on Green Belt land enable developers to carry on as usual which is to throw up dozens of poorly designed, low quality boxes. Due to the speculative nature, these houses make poor use of land through having no basements and little loft space due to prefabricated roofs.</li> <li>1 Due to their locations, they will continue to encourage car use with most households having at least two cars. There was a recent council house development in Norwich which won an award due to putting the local environment and way of living at its heart. There is no chance of this happening with such outmoded models. It is quite easy to predict that the infrastructure required will not be put in place and solutions will be required for the problems created.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9121
<b>Person ID</b>	1267086
<b>Full Name</b>	Maura Patterson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The large scale of development proposed for Dacorum appears disproportionate to that of other areas. I am against it due to the large size proposed , the lack of infrastructure from utilities, which in many areas are outdated, current flooding issues to the very real need for more schools and doctors to support the local area.</p> <p>Under current planning restrictions, the loss of green belt should only be in 'exceptional circumstances', what are these 'exceptional circumstances'?</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9131
<b>Person ID</b>	1267106
<b>Full Name</b>	Erica Spanswick
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Absolutely no way should this go ahead , I and most people I know are totally against this plan , our beautiful countryside will be gone forever , NO NO NO absolutely no .</p> <p>We will fight this again and again</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9133
<b>Person ID</b>	490903
<b>Full Name</b>	Mrs Sally Williams

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I disagree with the Local Plan and the housing numbers proposed.</p> <p>The development at Bearoc Park, Berkhamsted has caused significantly more traffic volume along a road that is used by school children walking to school.</p> <p>We cannot encourage our children to walk when we know they are being subjected to horrendous amounts of pollution. There are insufficient school places, medical provision is lacking, traffic pollution is increasing, road safety is an issue. Sensible, sustainable small developments of 2/3 houses where space permits, not huge estates causing local amenities to buckle under the strain.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9136
<b>Person ID</b>	1267110
<b>Full Name</b>	Laura Young
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Please note my objections to the Hemel local plan especially the development proposed next to grove hill which will ruin lively hoods of local farmers and destroy footpaths and bridle paths</p> <ul style="list-style-type: none"> <li>I do not agree that 16,000 houses should be in the plan and you should be using up to date figures which would halve that number to around 8,000 houses.</li> </ul>

- This 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 exception circumstance for removing Dacorum's green belt.
- Green belt land such helps protect the shape, size and character of towns and villages and prevents them merging into one another
- Your plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home
- Your plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses
- I have heard we don't have enough water to supply all the extra houses. It is a fact 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9148

**Person ID** 211352

**Full Name** Mr Andrew Sanderson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Plan does not achieve the objective it sets itself because growth will be accommodated 3-4km from the town centres. These, by definition are located at a distance away from "passenger transport and other services, facilities and employment opportunities". Paragraph 19.6 of the Plan does say "In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries.' But, beyond that statement there is absolutely no justification offered, except the Government 'target' that isn't actually a 'target'.

Indeed 19.7 also specifically states DBC have “identified those areas on the edge of the main settlements where exceptional circumstances exist”, thus inferring that exceptional circumstance exist for the settlements protected by the specific Green Belt releases. These “exceptional circumstances” are certainly not evidenced.

BRAG have demonstrated that DBC is building a massive oversupply of housing compared to ONS estimates. Why? What is the justification?

DBC have underestimated the number of windfall developments by 56% this despite the likely impact of change of use as a result of different working patterns following on from the pandemic. The cost is 850

hectares of irreplaceable Green Belt land. It’s almost as though the

Council want to join up all the towns in a ribbon development to deprive them of their individual identities and their countryside.

As BRAG states :

“Statement 2 in SP2 starts “The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring”. BRAG is concerned about this wording as in its current form it suggests that ‘investment’ will be focused on Hemel Hempstead and that investment will be supported by the growth at Berkhamsted and Tring. Certainly, historically infrastructure investment in Berkhamsted has not matched housing growth, while the majority of funds raised through s106 from developers compensating for the failure to build affordable housing and the Community Infrastructure Levy (CIL) payments have gone into Dacorum’s coffers for funding investment elsewhere. With much higher CIL payments in Berkhamsted than elsewhere in Dacorum, it is easy to see the fiscal attraction of promoting development in Berkhamsted, but if that is a driver then it is wrong.”

It’s also unjust.

Other key points:

23.119 accepts that “congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.

The new developments in Berkhamsted and Tring are so far from transport of other amenities that they cannot be justified sustainably; walking and cycling are not solutions.

The numbers proposed by DBC as a whole across the Borough are flawed.

It worries me that the Plan has a target of 'at least 2,200 new homes' for Berkhamsted and Northchurch. The adopted Core Strategy identified growth of 1,180 homes over that plan's 25-year lifespan, which equates to 47.2dpa. In reality, Berkhamsted has contributed to the Dacorum's new housing stock at a rate of 61.9dpa – in other words completions have out-performed the target by 31.2% in Berkhamsted while new housing stock in Hemel Hempstead has fallen behind the town's target by 9.3%. Much of this can be explained by developers' demand to build in Berkhamsted rather than satisfying need, i.e. Berkhamsted growth is becoming developer led rather than planning led and this Draft Local Plan as proposed is facilitating that process. Another injustice. Besides which, if the housing was affordable then there would not be so much pressure to build in Berkhamsted. Developers are building not for the people who live here but from people moving in from outside the area. This represents a failure to implement the existing Plan and meet existing needs of people living in the area.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9170

**Person ID** 1260547

**Full Name** Mark Pawlett

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment** I would like to voice my opinion of opposition of the Strategic Plan on the basis of proposed development on Green Belt land. This Green Belt designation was designed to protect our countryside and biodiversity. Developing on Green Belt will damage the area substantially.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9172

**Person ID** 1267157

**Full Name** FIONA MASTER

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I object to the number of houses proposed as I have read that the government have overestimated the need.</p> <p>I object because I believe that commuting patterns will change post covid and people will choose to live further from London and West Herts is an expensive area to live in.</p> <p>I object to the Green Belt being built on - there will be no green space around increasingly densely populated towns and villages.</p> <p>I object because there is not enough thought given to providing green corridors linking areas for wildlife to migrate through.</p> <p>I object because anyone who has walked on the footpaths and in the open spaces and woodlands around Dacorum over the past year will see that there is a need for more green spaces not less.</p> <p>This area is overpopulated and under infra structured and it will be ruined.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9176
<b>Person ID</b>	1267161
<b>Full Name</b>	ANDY HILL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	There are too many houses (already over 16000) and where they are being built no consideration is being given to local residents.

- As an example, the Pix Farm Lane 'Bellway Development' has resulted in large articulated lorries using the narrow Chaulden Lane, disrupting locals, walkers, causing traffic chaos and destroying verges and local wild life. The Bellway site over the past few weeks has been digging a white lime or cement powder into the ground. The fumes get onto your lungs when walking near the site!

There is far too much Loss of greenbelt land

There is a Negative impact on environment as highlighted in the example above but also in removal of wildlife habitats and removal of local beauty spots

There is a lack of appropriate infrastructure - Schools, no hospital and roads locally are already under severe stress

I am also concerned that the planning for schemes such as this are seemingly waived though, bulldozing the opinions of local residents. Recent schemes, initially rejected, are simply presented again after a short period, over and again, until finally gaining approval when the original objections still apply.

This all really does raise the question of whether there is a vested interest. The councillors are elected to serve by locals , for the locals and should be acting on our behalf.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9192

**Person ID** 1267190

**Full Name** Ms Susanna Bennett

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

* No	
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing</li> <li>- lack provision for affordable and social family housing (not flats) with adequate green spaces, gardens, parks and trees.</li> <li>- Impact on wildlife</li> <li>- impact on green spaces - we have all seem how important green spaces for exercise have been over the past year.</li> <li>- Failure to address climate emergency issues</li> <li>- Impact on infrastructure and local community, increased in traffic, pollution. Lack of secondary school places.</li> <li>- lack of medical care provision hospitals, GP's and social care (nursing and care homes)</li> <li>- Likely water and water waste disposal issues and damage to chalk streams</li> <li>- The lack of brownfield regeneration proposals.</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> <li>- 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9206
<b>Person ID</b>	1267203
<b>Full Name</b>	Ms Eileen Martin

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Question 2: Do you have specific comments about the Sustainable Development Strategy?</p> <p>Yes. It is not a sustainable development.</p> <p>The Plan for these houses may not serve mainly local people who have housing needs. They are more likely to go to London leavers.</p> <p>We do not have a reservoir for our water needs. The number of dwellings will increase pressure on the water supply by 28%.</p> <p>I have concerns about pressure on GPs, Schools, Police and the Road Network. There is no accessible Hospital.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9223
<b>Person ID</b>	1267249
<b>Full Name</b>	Ms Caroline Hart
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

**Spatial Strategy for Growth 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.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9230
<b>Person ID</b>	1264686
<b>Full Name</b>	Suzanne Doubleday
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9247
<b>Person ID</b>	1264411
<b>Full Name</b>	Claire Wilson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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>

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9252

**Person ID** 1267286

**Full Name** Ms Scott Cullen

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I am writing to express my concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, especially the proposed development in the countryside and how this will affect the Community and the environment.

In particular I am extremely concerned about:

- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation
- Over-provision of housing

- Failure to address climate emergency issues
- Impact on infrastructure and local community
- Likely water and water waste disposal issues and damage to chalk streams
- 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9261

**Person ID** 1267329

**Full Name** MARTIN DAVIES

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9283

**Person ID** 1267333

<b>Full Name</b>	JO MURPHY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9292
<b>Person ID</b>	1267333
<b>Full Name</b>	JO MURPHY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Delivery Strategy – flawed windfall calculations and projections leads to a faulty delivery strategy that prioritises building on Green Belt, especially surrounding Berkhamsted and Tring, over brownfield and urban development (contrary to NPPF), while holding back the bulk of the Hemel Garden Communities allocation for after the Plan is illogical. The Berkhamsted Delivery Strategy is clearly developer led and offers no protection to Green Belt or infrastructure improvements for issues that already exist.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9298
<b>Person ID</b>	1267332
<b>Full Name</b>	Nandi Jordan
<b>Organisation Details</b>	Chair Berkhamsted and Tring Labour Party
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth The plan must ensure adequate Social Housing, which is net zero in operation, as defined in our answer to question 1. The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9309
<b>Person ID</b>	1267339
<b>Full Name</b>	CHIARA MACDONALD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<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. 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 and residents parking. In addition, 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 and Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9317
<b>Person ID</b>	1267341
<b>Full Name</b>	ANDY WESTWOOD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	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: <a href="https://www.building.co.uk/news/jenrick-abandons-mutant-housing-algorithm-to-focus-on-urban-development/5109569.article">https://www.building.co.uk/news/jenrick-abandons-mutant-housing-algorithm-to-focus-on-urban-development/5109569.article</a> ).

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.

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).

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9329
<b>Person ID</b>	1267344
<b>Full Name</b>	ELLA PARKINS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>Firstly, do not agree that 16,000 houses should be in your plan and you should be using up to date figures which would halve that number to around 8,000 houses - which even then is way too many.</p> <p>This pandemic has shown how important our local green spaces are and our green belt land must be protected. Without the space and nature walks a lot of us would not be here right now. It is one of the only things that has kept us sane during these lockdowns. I do not believe that inflated housing need is an exceptional circumstance for removing Dacorum's green belt.</p> <p>The green belt land such as Rectory Farm helps protect the shape, size and character of towns and villages like Kings Langley.</p> <p>Also, your plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses.</p> <p>Please reconsider your plans as it will be a huge mistake if you do not.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9331
<b>Person ID</b>	1267346
<b>Full Name</b>	CHARLOTTE CLARK
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>The level of housing planned for dacorum is too high and will ruin the feeling of our area.</p> <p>This is especially true for the plans for Boxmoor which will ruin the very special Moor and in berkhamsted which as a small market town will ruin the history and feeling of such a spectacular area.</p>

All this when we don't even have a hospital. These plans must be changed

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9337

**Person ID** 1267356

**Full Name** Andrew Johnson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The following are my principal objections:

1 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.

2 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.

3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.

4 Impact on infrastructure. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing. It ignores issues such as traffic congestion, education provision and healthcare requirements.

5 Water supply and waste water. The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's three chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. In addition the proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion. If this is not addressed potential pollution of watercourses, especially in times of storm, is extremely likely.

6 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9341

**Person ID** 1267359

**Full Name** Neve Waters

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The current quotas are not sustainable and I feel strongly that DBC are simply choosing the easy targets without given due consideration to an innovative approach.

The encroachment on green spaces is unacceptable. We are already seeing the loss of amenity greens and garage spaces to fulfil quotas resulting in the destruction of important green areas. These are valuable to people's mental well being and this will result in communities being locked into bleak, concrete jungles as the trees and green spaces are being torn down. This was not the vision of the New Towns and whilst I appreciate that times have changed and demand

for housing has grown council need to be mindful about what drives people to settle in Hemel Hempstead and it's surrounding areas.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9343

**Person ID** 1267365

**Full Name** Mr Jont Cole

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set

out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9363

**Person ID** 1267367

**Full Name** Sarah Johnson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9377
<b>Person ID</b>	1267368
<b>Full Name</b>	Peter Leighton-Murray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9391
<b>Person ID</b>	1267370
<b>Full Name</b>	Patricia Beloe
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9400
<b>Person ID</b>	1267389
<b>Full Name</b>	Gillian and Andrew Lambourne
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We would like to join you in registering our strong opposition to the large number of new houses being imposed by government on Dacorum. This is a rural area, and the numbers being imposed are out of balance with the local infrastructure and the green belt which protects the quality and character of the area.</p> <p>Main roads in Dacorum become congested in normal times: tens of thousands of additional journeys will cause gridlock.</p> <p>The area is significantly adversely affected by noise pollution from Luton Airport, and this is entirely the wrong place to build additional homes.</p> <p>The whole nature and quality of rural villages would be changed by substantial additional development.</p>

We join you in opposing this inequable and unreasonable imposition.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9401

**Person ID** 1259485

**Full Name** Gail Skelton

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I wish to register my objection to the proposed plans based upon:-

1 The excessive number of houses proposed in the area of Chilterns AONB - accept some new housing needed but this is too much and will have a negative impact on the character of the town.

2 Loss of 850 hectares of Green Belt land in Dacorum -

3 Increase in Dacorum's population by about 20%. At, conservatively, two people per house an increase of over 30,000 people in a population of about 150,000

4 The threat to Ashridge from excessive recreational use

5 Additional traffic on existing and new roads

6 Lack of infrastructure to cope with additional demands e.g. GP, schools etc

7 Effect on water supply and water waste on the fragile Chiltern chalk streams

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9405

**Person ID** 1267391

**Full Name** JAMES WOODS

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>In response to the draft local plan entitled 'Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation' I would like to register my objections as follows:</p> <ul style="list-style-type: none"> <li>— I object to the proposals in the consultation because the proposals to build on the green belt are wrong.</li> <li>— I understand that there needs to be proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown: <ul style="list-style-type: none"> <li>— The housing projections are based on out-of-date statistics</li> <li>— The needs of local people have not been prioritised over the needs of developers — There has not been enough scrutiny of brown field sites</li> <li>— CV19 has changed behaviour meaning more town centre development is possible - this has not been taken into account</li> <li>— There are too many houses, yet not enough social and affordable housing - we should be building the right houses in the right places for local people - not giving a green light to urban sprawl</li> <li>— Not enough care has been taken to protect the local ecology - the demand for water will damage the aquifer and the internationally recognised chalk streams</li> <li>— The plans are not carbon neutral and conflict with commitments to tackle climate change</li> <li>— The houses proposed will encourage people to use cars as they are not near employment or transport hubs.</li> <li>— The increased populations in Tring and Berkhamsted will mean more traffic travelling along Northchurch High Street, leading to congestion, increased pollution, health problems, road safety concerns — this will be bad for the mental and physical health of our residents and future generations.</li> </ul> </li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9408
<b>Person ID</b>	1267392
<b>Full Name</b>	TANYA VERBEEK

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9432
<b>Person ID</b>	1267397
<b>Full Name</b>	TOM PERRY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Additional concerns</b></p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> </ul>

- Over-provision of housing, a large proportion largely unaffordable to locals, only encouraging the commuter out of London
- Failure to address climate emergency issues in that even current building guidelines do not go far enough to encourage eco-friendly, low carbon footprints
- Impact on infrastructure and local community as detailed above
- Likely water and water waste disposal issues and damage to chalk streams. With water utility's not statutory consultees, the pain will be felt for years before a solution is found
- 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9439

**Person ID** 1267398

**Full Name** Alexandra and James Donaldson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9473

<b>Person ID</b>	1157289
<b>Full Name</b>	Rodney O'Callaghan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p>

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamsted, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9493

**Person ID** 1267419

**Full Name** Eric White

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Spatial Strategy for Growth plan cites regional housing demand to support its vision for more homes than the area can sustain. It will personally affect my family's ability to maintain our health in the local countryside and contribute to my neighbourhood's already increasing traffic congestion and pollution. This increase in particulate pollution, already a menace, is set to increase substantially due to this plan - partly because of its neglect of basic research in urban planning, but partly because of its deliberate avoidance of the cross-regional implications of multiple development projects.

The latest data suggests the regional housing target should be 400-500 dwellings per year, but your target is around 1000 per year due to the council's decision to use outdated 2014 ONS figures. Despite this inflated figure, based on flawed data, the plan apportions only 10% of that new stock for affordable/social housing, which runs contrary to logic and ethics.

Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield). DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9503

**Person ID** 399324

**Full Name** Ms Julie Hollway

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

There are huge questions over whether DBC is fulfilling its obligation under the National Planning Policy Framework (NPPF) to protect the Green Belt, the boundaries of which "*should only be altered where exceptional circumstances are fully evidenced and justified*" (NPPF, paragraph 136).

SP2 (“Spatial Strategy for Growth”) and SP3 (“The Settlement Strategy”) are not agreed.

- The NPPF requires that “These policies do not recognise DBC’s obligations under the NPPF to protect the Green Belt and preserve Green Belt boundaries, and to conserve and enhance Areas of Outstanding National Beauty. These policies are based on a misunderstanding of para 11 of the NPPF, that a planning authority must “make every effort to meet the housing, business and other development needs of an area” (“Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth”, page 35). This is not what para 11 of the NPPF says, where obligations are subject to significant qualifications re Green Belt land and Areas of Outstanding Natural Beauty. The Town and Country Planning Act should be consulted for DBC to appreciate the misunderstanding.

The NPPF requires that “*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*” (NPPF, paragraph 172). DBC is thus under a legal obligation to take account of (and not only pay lip service to) paragraph 172 of the NPPF and to the CCB Management Plan when designing local plans which are within or which affect the Chilterns AONB. More generally, it is noted that DBC's proposals come at a time when the Glover Report (commissioned by DEFRA, 2019) have recommended that the Chilterns AONB should become England's next National Park, making development which adversely affects the area at odds with national policy. (DEFRA Landscapes Review, final report;

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/833726/landscapes-review-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf)

- Dacorum's own currently applicable Adopted Core Strategy states that: "*development will not be supported where it has an adverse impact on the sensitive open valley sides and ridge top locations*" (Dacorum Adopted Core Strategy, 2013, paragraph 21.6 ).
- Obligations under the NPPF are also to protect and enhance biodiversity – relevant to, for example, the impact that the proposed level of housing growth in the area will have on protected chalk streams;
- The proposed level of housing supply growth in the borough will place unacceptable strain on local infrastructure and resources, some of which (e.g. train services) are outside DBC's control, and will exacerbate already high levels of traffic congestion.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9515

**Person ID** 1264642

**Full Name** Jean Mack

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

(b) more fundamentally, the very nature of the plan and its wanton destruction of Green Belt countryside which cannot be justified.

Within the document, the role of Green Belt is described as "To assist in safeguarding the countryside from encroachment .... To check the unrestricted sprawl of large built-up areas". Green Belt designation has played an essential role in successfully protecting our environment and the health and well being of our local communities for many decades. It is needed now more than ever. Today, we are becoming painfully aware of the desecration of our countryside and the precipitous fall in biodiversity we are experiencing. We face an enormous challenge to halt and reverse this degradation, and maintaining the sanctity of the Green Belt is essential to it. The Council is only allowed to amend Green Belt Boundaries in "exceptional circumstances". This document fails to prove why current circumstances should be regarded as exceptional. The proposed development is exactly what Green Belt was designed to prevent, ie a council taking the least creative and most damaging route to fulfil its housing requirements by building excessively on virgin land.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9524

**Person ID** 1267427

**Full Name** Megan Humphreys

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9555

**Person ID** 1267439

**Full Name** Sharon and Paul Heideman

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9559
<b>Person ID</b>	1264246
<b>Full Name</b>	Steve Burdekin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Whilst I understand the need for more housing stock as well as genuinely affordable housing, I believe that these plans dramatically exceed what is needed, the type of housing that is needed and the sheer volume considering the environment that is considered.</p>

The various built-up conurbations that make up Dacorum have a distinct greenbelt-buffer between them all which makes this a happy place to live. Much of the proposed development is located within the buffer zones between the towns and in between the A41 and towns. This was used as a noise and pollution buffer zone which segregated a polluting A road from the towns and its inhabitant.

I would like to comment on the follow issues.

- Pretty much all proposed development will be on Greenbelt. – this goes against current Government policy not only building but on the climate crisis too.
- Brownfield/greyfield sites should be considered. This has been done across the country at former power stations (Rugely) and old Armed Forced bases amongst other sites.
- We have seen in recent years the need to maintain and increase the eco-system and for the natural world to thrive. Removing this habitat is adding to this problem now and for future generations.
- There are widespread and mainstream calls to rewild our green areas, plant more trees, create bigger natural eco-systems to help our carbon emissions. All of these plans go against that.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9576

**Person ID** 1267448

**Full Name** Gareth Evans

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I need to express my extreme concern - and objection to - the proposals contained in the Dacorum Borough Council Emerging Strategy for Growth.

In particular, the huge proposed development in the countryside and the impact this will have on the local Community as well as the Environment.

The overall impact on the environment and infrastructure, including increased traffic congestion, a strain on water supply, and waste water disposal, will be felt across the whole of Dacorum and further afield.

Specifically, I am extremely concerned about:

- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns
- Beechwoods Special Area of Conservation
- Over-provision of housing
- Failure to address climate emergency issues
- Impact on infrastructure and local community
- Likely water and water waste disposal issues and damage to chalk streams
- 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9581

**Person ID** 1207881

**Full Name** Tricia Maloney

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I would like to register my concern at the Dacorum local plan, a leaflet was posted through my door recently and I have previously attended meetings regarding the plan and local developments.

The figure of 922 homes to be built per annum is a huge amount. Of these I understand 315 will be affordable housing. This is unacceptable. We should be looking to provide homes for those on our housing register, not providing homes for those looking to move out of, or closer to London. I am very much in favour of a diverse community and don't think everyone should work locally but we need people to be committed to our communities, our towns, our open spaces – presumably all reasons they want to move into the area.

Hemel is a town in Hertfordshire, not a suburb of London. We need to retain our open spaces and green belt land. Our family has grown up playing in Gadebridge Park, walking along the canal, across Boxmoor and up to Roughdown Common. Wherever we have lived in Hemel has been close to open spaces, the housing estates have provided large greens for children to play safely along with nearby play parks, in Nash Mills we also had a 'little wood' nearby.

All of these places will start to disappear if we continue with this current plan. I note the statistics used aren't current and have surely been affected by both Covid and Brexit. We should look again at the numbers required using current data – we have a census coming up in a few weeks. We should look to develop our brownfield sites – the industrial estate and town centres to include housing of a good size, with green spaces and local facilities.

I hope Dacorum BC will look again at this plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9592

**Person ID** 1261841

**Full Name** Vicki Fruish

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I am writing to express my concern at the high and unnecessary number of houses proposed in the Dacorum local plan. I understand that the numbers used to inform the plan are flawed and are not based on recent information. Too many

houses are planned and are not required. Also the development does not take the impact of societal changes resulting from Covid 19. Changes in shopping and working means that commercial buildings will need to be repurposed. Fewer people will commute to London as jobs become more home based and people can therefore afford to move further away from London and commute occasionally. They will not choose to live in Dacorum which is expensive given its proximity to London. The smaller number of housing needs could be met from existing brown Field sites rather than encroaching further into our towns and villages. Repurposing buildings would achieve greater environmental benefits and assist with climate change.

The negative impact on the green belt, the character of the villages and towns from the volume of the proposed housing will be substantial. These areas benefit from green space providing areas of sanctuary for wild animals and insects, recreation and peace for locals and visitors. Each village and town has its own character which comes from being distinct, separate and spaced from one another. We are faced with a sprawling mass of concrete and humanity. The natural water sources will not be able to cope. The infrastructure will not be able to cope. The traffic passing through these areas, including generated from residents already overwhelm streets, car parks and make for significant congestion.

The Local plan is not reasonable nor will it achieve its stated aims. Its impact is negative and the basis on which the proposals have been made must be reviewed and the numbers adjusted substantially downwards.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9603

**Person ID** 1263214

**Full Name** Mr R Pope

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

- Can you assure me that Dacorum is not being asked to identify more housing provision than other Hertfordshire districts (St Albans, Hatfield, Hertford, Harpenden etc.). It appears that the St. Albans Plan includes housing development mainly in Dacorum (Hemel Hempstead).

- Why no development in the Felden, Flaunden and Chipperfield? Is the greenbelt more valuable in these villages than in Northchurch?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9604

**Person ID** 1267455

**Full Name** Ms C Wilby

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

- Can you assure me that Dacorum is not being asked to identify more housing provision than other Hertfordshire districts (St Albans, Hatfield, Hertford, Harpenden etc.). It appears that the St. Albans Plan includes housing development mainly in Dacorum (Hemel Hempstead).
- Why no development in the Felden, Flaunden and Chipperfield? Is the greenbelt more valuable in these villages than in Northchurch?

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9612

**Person ID** 1267456

**Full Name** David Sidebottom

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>These plans will have a catastrophic impact on the local community and the amazing surrounding countryside and will impact on the safety of pedestrians and motorists. They are not based on the latest up to date information, no consideration has been taken on the impact of the pandemic, or on climate change, data sourced is out of date and there is a notable lack of flexibility by the council to keep up with this latest data. Also the process has not been inclusive and pushing ahead with the plans in the last year during significant periods of lockdown is irresponsible.</p> <p>The plan and strategy must be reconsidered immediately.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9616
<b>Person ID</b>	1151590
<b>Full Name</b>	Lynda Clarke
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No	
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p><u>(5) Spatial Strategy for Growth</u> The massive proportion of growth in development of new homes appears to be incorrectly taken from Governments Standard Methodology as a strict housing target NOT an updated figure on the amount of growth previously assessed by the Council and the ONS. This could lead to over supply in the Dacorum area encouraging people to move into the area, without local employment opportunities. The types of homes that will be built here will be attractive to developers as it is a high cost area (particularly South Berkhamsted) so the houses built are in the wrong place and the wrong type. See the recent development at Bearoc Park to get an idea of what is likely to be built.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9630
<b>Person ID</b>	1151590

<b>Full Name</b>	Lynda Clarke
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9643
<b>Person ID</b>	400471
<b>Full Name</b>	Mrs Ruth Constable
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	The Plan has not looked at sites within Tring which could be sustainably developed e.g. office space ( in the light of more home-working ) and retail space( in the light of the report that 25% less retail space will be needed in the future). Increasing the number of houses in Hemel Hempstead would be a more sustainable option because it would avoid the necessity of commuting from Tring, where there are fewer jobs.

The infrastructure supporting Tring's current population is under strain. The proposed increase in housing would put added strain on all resources to the extent that they would not be sustainable.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9666

**Person ID** 1267468

**Full Name** Chris Berry

**Organisation Details** CPRE Hertfordshire

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

**OBJ – GRO, GRBT, LAND, DTC**Chapter 5 on the spatial strategy 'key principles' in paragraph 5.2 is opposed, mainly for the reasons set out in response to Question 1. Up to date evidence is not shown for the massive proposed growth of Hemel Hempstead, Berkhamsted and Tring, or to promote growth of villages set in the Green Belt, or that there is 'a requirement for development on Green Belt'. Protected 'sites' are referred to, but these should include protected 'designations', not just sites.

Similarly, there is insufficient evidence to justify 'significant uplift in growth' (paragraph 5.3), and for the statement that 'we know' growth cannot all be accommodated in the urban areas, when the amount of development has yet to be determined.

The proposed extensions to Hemel, Berkhamsted and Tring, and the farther north-eastward extension of Hemel (paragraph 5.4 and repeated in paragraph 5.8 in the context of Hemel Garden Communities (HGC)) are strongly opposed. Any cross-boundary projects such as HGC should not be promoted ad hoc across local authority boundaries in separate development plans, but through an additional joint plan if both authorities can justify its promotion.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9667

**Person ID** 1267468

<b>Full Name</b>	Chris Berry
<b>Organisation Details</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>The claim that Berkhamsted and Tring cannot absorb any higher density development, resulting in expansion into the Green Belt (paragraph 5.5) is contrary to two aspects of national planning policy, and needs to be reconsidered.</p> <p>Consequently, CPRE Hertfordshire opposes Proposed Policy SP2 on spatial growth, including in particular criteria 1 a, b, and d; 3 a, b, c, d, and g (which significantly underestimates windfall housing capacity); and criterion 5 which promotes even more development than proposed in the draft Plan, through neighbourhood plans, and fails to dissuade development contrary to the Local Plan and national policy.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9681
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation Details</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	As noted in previous responses, specific delivery strategies cannot be supported due to the unevidenced scale and inappropriate locations of proposed development throughout the Strategy.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9698
<b>Person ID</b>	1267474
<b>Full Name</b>	Fiona Porter-Hough
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<b>Greenbelt invasion</b> As our lives have become busier so has the importance of Green Belt. Its value on health and wellbeing can't be undervalued. Green Belt are areas where wildlife flourishes, where improved air quality is found and nature reigns. Without these areas, land becomes just one continuous man-made development. Rain water has nowhere to seep into the ground and there is no end to the long term environmental impact that it will have. The law says we can only build on the Green Belt if it has been proven necessary but no one has proven this. Developing the Brown Field sites is surely a much better solution and way forward instead of encroaching on Green Belt. Once Green Belt is built on it is lost forever.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9702
<b>Person ID</b>	1267478
<b>Full Name</b>	Saul Thomas
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

**Spatial Strategy for Growth comment**

I am writing to express my concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.

The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.

In particular I am extremely concerned about :-

- Increased traffic through Berkhamsted and Potten End (already overwhelmed) due to vehicles wishing to access the A41, B440, and M1
- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation.
- Over-provision of housing.
- Failure to address climate emergency issues.
- Impact on infrastructure and local community.
- Likely water and water waste disposal issues and damage to chalk streams.
- The lack of brownfield regeneration proposals.
- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny due to much of the year having been spent in lockdown.
- 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9714

**Person ID** 1267480

**Full Name** Paul Townsend

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9723
<b>Person ID</b>	1267480
<b>Full Name</b>	Paul Townsend
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Delivery Strategy – flawed windfall calculations and projections leads to a faulty delivery strategy that prioritises building on Green Belt, especially surrounding Berkhamsted and Tring, over brownfield and urban development (contrary to NPPF), while holding back the bulk of the Hemel Garden Communities allocation for after the Plan is illogical. The Berkhamsted Delivery Strategy is clearly developer led and offers no protection to Green Belt or infrastructure improvements for issues that already exist.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9737
<b>Person ID</b>	1267485

<b>Full Name</b>	Henry Pearce
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to state my opposition to the plans to build 16000 homes in the next 18 years within the Dacorum Borough as set out in its Local Plan Consultation.</p> <p>It should go without saying but in case a reminder is needed, the potential destruction of huge areas of green belt land is very obviously damaging to wildlife, the local environment and therein the population who live in the nearby area. As people have been confined to their immediate surroundings during the pandemic, the benefits of spending time in nature are more apparent than ever. If people are not able to experience this in their local area they will be forced to travel to other areas that are protected. As you can see the loss of this green belt land is not just in and of itself but will potentially have an impact on other protected areas through people being forced into travelling further afield to experience nature.</p> <p>While development of the local surrounds is both necessary and desired, this also requires an investment in the existing infrastructure that would facilitate that increase.</p> <p>With the plan providing no indication of investments in transport links, better road conditions, maintenance and or renovation of existing property or housing and support for the small businesses in the local economy, it would appear that the focus of Dacorum Borough Council appears to be directly on the private profit to be made from these excessive housing developments and has nothing to do with improving prospects for either current or future residents.</p> <p>Though I live in Aston Clinton which by definition is not part of Dacorum Borough, our village already suffers with a huge amount of heavy goods traffic as it acts as a thoroughfare between Tring, Aylesbury and High Wycombe. The prospect of 18 years of concentrated housebuilding and the subsequent increased pollution, traffic and disruption is also among my concerns.</p> <p>As stated before, I am not opposed to all development in the local area; however, if the proposed solution is to just throw vast amounts of new (unaffordable) housing at the problem, I must state my objection to it.</p> <p>As a compromise, I must ask the council to at least halve the number of proposed houses being built at a minimum and invest the remaining money into the rest of the Borough, as previously outlined. This would at least mean the new residents would be assured a better quality of life and the current residents would also benefit from the investment into the local economy. Most importantly, with the effects of climate change becoming ever more apparent, it will considerably lessen the impact on the environment and protect what is left of the green belt land in the local area.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9738
<b>Person ID</b>	1267487
<b>Full Name</b>	Vivien Calcutt
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I strongly oppose building on greenbelt land
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9824
<b>Person ID</b>	
<b>Full Name</b>	
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would

have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9842

**Person ID** 1267730

**Full Name** LISA NEWING

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Having only just found out about the proposal to build thousands of new houses in Hemel Hempstead, Berkhamsted and Tring, I absolutely disgusted that yet again our green belt area is being built over. I'm thoroughly against this and would like to find out more with regards to stopping this going ahead.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9844

**Person ID** 1267733

**Full Name** JULIE COOK

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am very concerned about the apparent use of green belt land for more housing. Given the fact that the Government has done a u turn on building houses on green belt this plan already seems outdated and so needs to be updated to reflect this change. I would like to understand what exceptional circumstances the council feel mean that development on greenbelt land that is adjacent to areas of outstanding natural Beauty such as next to Tring is acceptable.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9884
<b>Person ID</b>	1267759
<b>Full Name</b>	PETER AND TRACY DUDLEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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>

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** Spatial Strategy for Growth

**ID** EGS9903

**Person ID** 1267770

**Full Name** Lisa Toms

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9908

**Person ID** 1267772

**Full Name** JULIE COURT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

My Parents moved to HH from London in the 50s.

They were part of the 'New Town' idea - satellite towns around London to accommodate families from London and possibly it's slums.

They loved their new life in the 'country' along with my brother and sister both under 10 years old. They knew that no matter what, as this town was surrounded by 'green belt' it would always stay a small town in the countryside- what better way to provide a good life for your children and future generations?

They had a shiny new hospital built, shops, schools, parks, doctors surgeries... it was idyllic for them.

My sister has since told me how the original Hemelites hated the newcomers and what they did to their small town... ripping down buildings and 'developing' areas.... I do not blame them and can empathise with them completely.

One only has to look on Facebook to read how people now mourn the loss of such beautiful buildings and places... and cannot understand why places like Berkhamsted, Tring and St Albans have retained their charm and character managing to remain pretty, yet functional places to live.. they love the community we have but are sad for the loss of the beautiful town we could have been...

Hemel is now soulless. I was born in 1964, and I grew up in Hemel Hempstead- I loved my town yet as the years have passed I am more and more disillusioned with the planner's poor decisions- I do not understand what you are trying to do to our town?

History is repeating itself but now, it's not the beautiful old buildings being ripped apart it's our beautiful green belt- our surrounding countryside, our green space that my parents were told would ALWAYS be protected. Their legacy is being trampled on, they came here for a new life for themselves and their children yet, now I am saddened to find I don't want this awful town for my children and grandchildren, or indeed myself... as soon as we are able we are leaving Hemel because the town planners do not listen or are not interested in what the people of Hemel Hempstead want.

We need schools, a hospital, pretty little shops, department stores, proper police station.... the list is endless yet DBC charged extortionate rent/rates and plan more housing in a town with absolutely no infrastructure to support it. Yes I am aware that HCC and other government bodies are responsible for done of these things but building more housing will only add pressure onto the already crumbling infrastructure... and Dacorum BC, it's councillors, it's MPs should all be focused on fighting on behalf of their townfolk to retain the green belt, stop new buildings planning and improve/reinstate the facilities we do desperately need.

I do not understand why or how anyone would feel it is in anyone's interests to build more housing on our greenbelt land when it cannot support properly those already living in the town.

Please reconsider this terrible plan, the town is dying and you are killing it off.

I do not support the plans and object to the programme 100%.

Let's try to make Hemel Hempstead a nice place to live - together. Please do not destroy my parents legacy.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9915

**Person ID** 1267774

**Full Name** AATMA SEESURRUN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** (5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9920

**Person ID** 1267776

**Full Name** Will Garbutt

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>As a resident of Northchurch Common, I am writing to register my concern and express my astonishment and disgust at plans for the proposed massive housing expansion projects and developments in the Tring, Berkhamsted &amp; Northchurch area. My reasons are:-</p> <p>1.The overall amount of houses across the borough is disproportionate to current population growth figures.</p> <ol style="list-style-type: none"> <li>1 No thought to the impact on the impact on congestion of roads which are small and largely already in a very bad state.</li> <li>2 This is greenbelt land and needs to be conserved for delicate ecosystems of wild animals, insects, plants and trees.</li> <li>3 No clarity on whether these 17,000 extra house in the proposal will be affordable 5. The impact on overcrowding of school places dwindling for current residents, many of which moved to the area at great expense to get a better education for their children.</li> <li>4 The impact on climate change will be huge at a time when we need to taking great care to scale back on damage to the environment.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9932
<b>Person ID</b>	1267774
<b>Full Name</b>	AATMA SEESURRUN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>Flawed windfall calculations and projections leads to a faulty delivery strategy that prioritises building on Green Belt, especially surrounding Berkhamsted and Tring, over brownfield and urban development (contrary to NPPF), while holding back the bulk of the Hemel Garden Communities allocation for after the Plan is illogical.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9943
<b>Person ID</b>	1267786
<b>Full Name</b>	BRYONY GLENN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to OBJECT in the strongest possible terms to the proposals in the Dacorum Borough Council Emerging Strategy for Growth. This is going to have a huge and irreversible impact on protected green belt land in an area of outstanding natural beauty - shame on you.</p> <p>The government has acknowledged that the formula needed to calculate the necessary number of houses is incorrect and yet there has been no attempt by you to review the necessary provision in light of this. In addition the levelling up agenda is focussed on a greater need for house building in the North than the South of England, so why has the local plan not subsequently been adjusted downwards in terms of the number of proposed houses to reflect this. COVID has also had a significant impact on the number of people travelling into London for work and it is widely acknowledged that this will continue as a longer term trend, so the need for houses within commutable distance of London is likely to reduce rather than increase.</p> <p>Why is there so little brownfield regeneration as part of the plans - building on protected AONB green belt is environmental desecration.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9974
<b>Person ID</b>	1267796
<b>Full Name</b>	Kim Rodwell

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>This email is to express my genuine concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth document. I am particularly concerned about proposed developments in the countryside, green belt and the impact this will have on the community and the environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal will be felt across the whole borough and beyond. The waste water provisions are already stretched beyond capacity and further growth is a real threat to our waterways. Developments on the edge of our town will only encourage further car trips into the town centre and a brand new multi storey car park encourages this!</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing, a large proportion largely unaffordable to locals, only encouraging the commuter out of London</li> <li>- Failure to address climate emergency issues in that even current building guidelines do not go far enough to encourage eco-friendly, low carbon footprints</li> <li>- Impact on infrastructure and local community as detailed above</li> <li>- Likely water and water waste disposal issues and damage to chalk streams. With water utility's not statutory consultees, the pain will be felt for years before a solution</li> <li>- The lack of brownfield regeneration proposals</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny</li> <li>- 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.</li> </ul>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9982
<b>Person ID</b>	1267847
<b>Full Name</b>	CRAIG & ANNA SCARBOROUGH
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS9986
<b>Person ID</b>	1267848
<b>Full Name</b>	CALEB PRINGLE
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>In response to the draft local plan entitled 'Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation' I would like to register my objections as follows:</p> <p>I object to the proposals in the consultation because the proposals to build on the green belt are wrong. The proposal is for too many houses and would result in a 50 percent increase in the population of Northchurch. This is not feasible given the topology and built status of the area and needs to be withdrawn and rethought.</p> <p>The housing projections are based on out-of-date statistics. The current projections are not based on the most recently available statistics and moreover the most recent statistics, which would provide for a much smaller growth in housing, do not account for the ongoing increased seasonal mortality to be anticipated from Coronavirus and its variants, nor for the impact of reduced immigration from Europe due to Brexit. To proceed with any of the building and in particular any changes to infrastructure would be reckless under these circumstances, especially considering the unique and protected nature of the ecological environment in Northchurch. The proposed plan should be withdrawn, rethought, re-drafted and re-presented with all known issues taken into consideration.</p> <p>— I understand that there needs to be proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown:</p> <p>— The housing projections are based on out-of-date statistics</p> <p>— The needs of local people have not been prioritised over the needs of developers — There has not been enough scrutiny of brown field sites</p> <p>— CV19 has changed behaviour meaning more town centre development is possible - this has not been taken into account</p> <p>— There are too many houses, yet not enough social and affordable housing - we should be building the right houses in the right places for local people - not giving a green light to urban sprawl</p> <p>— Not enough care has been taken to protect the local ecology - the demand for water will damage the aquifer and the internationally recognised chalk streams</p> <p>— The plans are not carbon neutral and conflict with commitments to tackle climate change</p> <p>— The houses proposed will encourage people to use cars as they are not near employment or transport hubs.</p>

— The increased populations in Tring and Berkhamsted will mean more traffic travelling along Northchurch High Street, leading to congestion, increased pollution, health problems, road safety concerns — this will be bad for the mental and physical health of our residents and future generations.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9992

**Person ID** 1267853

**Full Name** MARINA BURKE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The following are my principal objections:

1 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.

2 Over provision of housing. The council has not used up to date figures to calculate housing need. Using the most recent official government projections, from 2018, should result in a housing need calculation that is around half of that currently proposed in the plan. As a consequence of using the older 2014 ONS data, the proposed plan will destroy 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green spaces to build 16,596 new homes.

3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.

4 Impact on infrastructure. The plan as proposed does little to address the improvements in infrastructure required to support the increase in housing. It ignores issues such as traffic congestion, education provision and healthcare requirements.

5 Water supply and waste water. The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's three chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. In addition the proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion. If this is not addressed potential pollution of watercourses, especially in times of storm, is extremely likely.

6 Brownfield regeneration. In the light of recent events (Covid and Brexit) and trends in the retail sector, the government allows commercial and office 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS9996

**Person ID** 1267854

**Full Name** MARTINA HALLEGGER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Spatial Strategy for Growth plan cites regional housing demand to support its vision for more homes than the area can sustain. It will personally affect my family's ability to maintain our health in the local countryside and contribute to my neighbourhood's already increasing traffic congestion and pollution. This increase in particulate pollution, already a

menace, is set to increase substantially due to this plan - partly because of its neglect of basic research in urban planning, but partly because of its deliberate avoidance of the cross-regional implications of multiple development projects.

The latest data suggests the regional housing target should be 400-500 dwellings per year, but your target is around 1000 per year due to the council's decision to use outdated 2014 ONS figures. Despite this inflated figure, based on flawed data, the plan apportions only 10% of that new stock for affordable/social housing, which runs contrary to logic and ethics.

Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield). DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10002

**Person ID** 1267856

**Full Name** HOLLY GREENAWAY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10007

**Person ID** 1267858

**Full Name** KATE & PHIL BAILEY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Spatial Strategy for Growth  
80% of the new dwellings in Berkhamsted are proposed to be built on new greenfield Green Belt releases. As mentioned above, the methodology behind Dacorum's estimated dwellings is questionable at best, taking no account of the actual windfall numbers in recent years. Such development would lead to too many of the wrong type of houses being built in the wrong places - damaging the Chilterns AONB and destroying acres of farmland for ever.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10017

**Person ID** 1267862

**Full Name** ALEX CHAPLIN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

Yes / No * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10034
<b>Person ID</b>	218427
<b>Full Name</b>	Mr Bruce Kent
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Requirement for additional Housing.</p> <p>The basic assumption that there is very substantial demand for additional housing in Dacorum, is based on a flawed model. We have recently had 2 major changes which will fundamentally change the demand calculation.</p> <p>Firstly, the pandemic has changed the way in which many of us work. There is no evidence that additional housing will be linked to a significant increase in the number and size of local businesses to justify a large increase in housing, so the assumption is that the housing will be provided for people who are commuting, to locations with substantial business requirements. The likelihood is that the demand for city centre office space will decline substantially, so why would commuters who no longer need to commute choose to live in the more expensive locations. Close commuter links will no longer be a significant factor, so you need to re-think where your demand is coming from.</p> <p>Secondly, the “native “ population is not increasing. Young people are now having their children later, and there is greater emphasis on women having equal rights to a long and fulfilling work life. The increase in population increase has been based on the emphasis in immigration and the families that follow. We now have a specific government policy to control immigration and limit it to where there are job requirements. The pandemic has resulted in a substantial increase in</p>

unemployment, and this will result in a situation where emphasis will be on re-training U K residents to match job vacancies with a significant impact in immigration.

In view of these recent events, any plan should release the minimum area of green belt, pending a further informed assessment of demand generally when the consequences of recent events can be properly assessed.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10041

**Person ID** 1267889

**Full Name** Ms Alison Brathwaite

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10046

**Person ID** 1155402

**Full Name** Christopher Stafford

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment** (5)  
 Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10064

**Person ID** 489014

**Full Name** Mrs Carole Lewis

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Green belt is meant to prevent towns coalescing, and encourage renewal of town centres but release of Green belt once relinquished is irreversible. Once land is released for housing, even if the number is revised down in future, it will be very difficult for the Council to prevent developers building on it. If we resist the incorrect target, then we will probably not be forced to release greenbelt, or at least a very reduced amount.</p> <p>Land which is currently green belt absorbs carbon through its soil and vegetation. When we release this for house building we start at a major disadvantage in trying to meet our carbon reduction targets. On top of all of this many of the developments proposed are outside of town, and we run a serious risk of creating car dependent communities which damages the UK's 2050 Net zero target enormously.</p> <p>The pandemic has made us all realise how much we need our open spaces, and this plan proposes to damage our AONB and other natural assets.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10073
<b>Person ID</b>	1267996
<b>Full Name</b>	Mr Christopher Vile
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>Additionally I'm concerned at the loss of green belt space, that I personally enjoy and feel should be protected from endless building. The biodiversity of the area will be greatly effected within an area of outstanding natural beauty. The government should instead encourage more even distribution of population centres around the UK.</p> <p>The global pandemic has irreversibly changed people's work habits. This should be taken into account as a new factor, with people now able to live and work outside the south east. Dacorum council should delay the consultation and factor in the population impact of the pandemic - such as changes in working habits. I do not feel creating such a long term plan, with so much uncertainty mid-pandemic, is a wise approach.</p> <p>I'd like Dacorum council to reconsider the methodology used for the increases, as I understand from local councillor Stevens, it may be based on out of date ONS housing estimates. I'd also suggest awaiting the census results from this year.</p> <p>Again I'd want to make clear my whole hearted objections to this proposal and wish for reconsideration of the scale to better acknowledge Berkhamsted and its unique challenges around space.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10084
<b>Person ID</b>	1268034
<b>Full Name</b>	MR IAN GUNTER-JONES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I emphatically object to draft Policy SP2, as it is not fit for purpose in its current form.</p> <p>Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wher ein the majority is located within the Green Belt, cannot be justified in planning terms. The Council h as failed to justify this target as a requirement</p>

against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation.

The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of actual 'need' in an area.

It is only after consideration of the level of 'genuine need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate this was appropriate so as to reduce impact on infrastructure.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council’s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10102

**Person ID** 1268045

**Full Name** C PERRY

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify</p>

development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10114

**Person ID** 1268049

**Full Name** JANE AND MICHAEL DRAKE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** My wife and I would like to protest against Dacorum's Draft Local plan.

We are concerned about the LOSS of 2,000 ACRES OF GREEN BELT and open spaces and the effect on the Chilterns Area of Outstanding Natural Beauty. Building on this scale would increase POLLUTION and have an adverse effect on the CLIMATE.

We feel there is an OVERPROVISION OF HOUSING based on out of date targets. The local Plan should be based on 2018 figures which suggest a housing target of 500 houses per annum. AFFORDABLE STARTER HOMES should be a PRIORITY.

There would be an INCREASED STRAIN ON THE LOCAL INFRASTRUCTURE, water and sewerage, road usage, parking, schools and medical practices.

There has been an UNDER ESTIMATION OF BROWN FIELD POTENTIAL.

We STRONGLY OBJECT to Dacorum's local Plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10119

**Person ID** 1146091

**Full Name** Mr John Foster

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**Spatial Strategy for Growth comment**

The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10134

**Person ID** 1249632

<b>Full Name</b>	Mrs Lorna Bloomfield
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am totally opposed to the overall plan, as the number of houses proposed is far in excess of the local needs currently and especially the plans for Growth Areas HH01 and HH02.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10138
<b>Person ID</b>	1264938
<b>Full Name</b>	David Bloomfield
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am totally opposed to the overall plan, as the number of houses proposed is far in excess of the local needs currently and especially the plans for Growth Areas HH01 and HH02.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10142
<b>Person ID</b>	1268068

<b>Full Name</b>	MICHAEL MATFIN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to the proposed expansion of housing in the borough under the newly proposed local plan. The proposed numbers of new homes are really excessive.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10146
<b>Person ID</b>	1208053
<b>Full Name</b>	Nick Wilson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Nobody is denying that the nation requires housing. However, I object to the volume of housing planned for Dacorum – specifically in those areas where Green Belt land will be used as building sites.  Planning Data Planning targets for Dacorum are based upon out of date housing projections from the Office for National Statistics (ONS), meaning the uplift for new dwellings is artificially high.

Subsequently, this inflated number is in part responsible for the huge amount of Green Belt that is due to be released for housing as part of the Dacorum Local Plan.

Releasing Green Belt next to commuter towns within easy reach of London will not provide the housing that we desperately need for local people, rather we will experience a further influx of people moving out of London in search of cheaper property prices. I would suggest that the 'need' to build on Green Belt is being driven by developers – keen to build premium, high-margin 'executive housing' providing scenic views of the Chilterns.

#### Environmental

Digging-up Green Belt land on which to build housing would be a sin. Once it's gone – it's gone. Dacorum's towns are entwined with the Green Belt and the biodiversity it provides. It is what defines the region. There are few towns where you need to cross a meadow containing grazing cattle in order to access the railway station. To build a 6-8 storey apartment block overlooking the Station Moor would be reprehensible.

#### Post-Covid.

Apart from the need to use ONS data that is actually up to date, we need to reassess the data to look at the changing landscape of the country – and the demands placed upon it.

The Covid pandemic has already negatively impacted the way the country does business – a change which will in all likelihood mean that more offices countrywide will sit empty as companies re-evaluate how they function and more people work from home. Coupled with the impact on retail – with the nations high streets unlikely to recover, utilising green belt for housing is a folly. We should be looking to renew & re-energise more of our town centres by turning them over to housing, meaning we can reuse existing brownfield sites and bring more people into the town centres – which otherwise are destined to turn into ghost towns.

#### Included files

<b>Title</b>	Spatial Strategy for Growth
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<b>ID</b>	EGS10175
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<b>Person ID</b>	1259999
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<b>Full Name</b>	Paul Peters
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#### Organisation Details

<b>Agent ID</b>	
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<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Number of houses in the local Dacorum Plan and government target:  The numbers used by Dacorum Borough Council are based on old ONS data. Newer more appropriate data is available, but the council has failed to relook at the numbers and are therefore hugely overestimating the number of houses the area needs. Correct estimates suggest in the region of 355 houses are needed in Dacorum per year almost a third of the target set by the council of 922. Furthermore, local restrictions, greenbelt and circumstances have not been considered. The governments figures are a guide not a target but Dacorum are treating the starting point (from which local authorities should assess local circumstance) as a strict target and are using it as an excuse to eat away at greenbelt with developer lead proposal. Greenbelt should be protected for all but “exceptional” circumstances. Confused and fudged numbers are not exceptional circumstances.</p> <p>Furthermore, the developer lead plans do not provide the affordable housing that is needed in the area, and only serve to create houses for people of affluence which completely defeats the point of the targets.</p> <p>In summary I would like to see the Council, scrap the existing plan, 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.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10191
<b>Person ID</b>	1268090
<b>Full Name</b>	Jean Jenner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>From what I can see, the numbers are incorrect, based on incorrect information and targets. We need some affordable housing but not all the other houses proposed. Currently, much affordable housing is poky, unattractive and inadequate, and plans need to include checks and safeguards to ensure they have adequate space, gardens, kitchens and parking. The council must protect green belt land and put higher priority on the environment and wildlife. Building 'sustainable' housing while trashing the local environment is counterproductive. Wildlife and nature is vital for our own well being and mental health, as well as the benefit of the environment. Currently there is stress on local beauty spots due to pressure of numbers. We need many more local new walks/ cyclepaths, areas of beauty eg woods, lakes, meadows, wild thickets, hedgerows, playgrounds etc and you should look to create these integrated into all plans, which should also link up as a network for nature, the wildlife corridors that we need.</p> <p>Local developers are ripping out trees and hedgerows and local thickets and the council needs to stop this and protect our natural heritage.</p> <p>The borough has a really lovely character and the environmental heritage must be preserved. The council should only be looking to build housing where absolutely necessary for local need according to the most up to date information.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10197
<b>Person ID</b>	1059789
<b>Full Name</b>	Mrs Alison Somek
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Care for villages and village identity – I am extremely worried about the loss of culture, being and identity of our villages and towns. This is not right. Residents of these places have worked over many years to develop their communities and this plan, in one fell swoop, destroys those existing identities. This will have a significant effect on the mental health and well-being of residents. In turn loss of identity and a sense of being is likely to lead to poor behaviours at best, and an increase in crime at worst.</p>

To avoid this, it is my opinion that it would be preferable to build one whole new town for the bulk of housing and development need, allowing for a total new infrastructure to serve that town. This could be supported by some small developments to the existing towns and villages, rather than destroy the existing. There must be many single houses on large plots, that could create another house or two or three; such small developments will not destroy the village/town identity and will have little impact on infrastructure.

My final point is about the lack of cohesion in the plan. It seems to me that you have chopped Dacorum up into chunks and made plans for each chunk. Whilst this is understandable and necessary, it must also be looked at as a whole. For example, with LA3 and the potential plans for Bulbourne Cross, Berkhamsted and Hemel Hempstead are merging into one, and Bourne End as a village with its own identify will cease to be.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10198

**Person ID** 1059789

**Full Name** Mrs Alison Somek

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Housing Delivery –Climate Change and Sustainability – you talk about the need to reduce carbon emissions and I totally support this aim. However, it seems to me that the housing plan proposed, in particular, is completely in conflict with these objectives. To achieve the housing plan, you are decimating the greenbelt, felling trees and hedgerows and I cannot support this approach. You MUST look at more innovative ways of achieving your aims, and avoid using the green belt. With current reduction in need for office space, you should be looking to use more brownfield sites.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10202

**Person ID** 1059789

<b>Full Name</b>	Mrs Alison Somek
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I do appreciate the need for more housing, especially affordable housing – but the plan as detailed is not the right approach.</p> <p>I understand the need for more housing and that the Government has issued targets. However, it is right and proper that local councils take into account local needs, and local constraints and that YOU represent your constituents accordingly. I ask you to push back on the Government’s targets and stand up for the residents who you represent.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10221
<b>Person ID</b>	1268167
<b>Full Name</b>	CHRIS YOUDELL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing

target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10233

**Person ID** 1268173

**Full Name** AUDREY BADCOCK

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I write to add my objections to your latest, incredibly short-sighted development plans for Hemel Hempstead.

- Given the almost daily warnings of what we are doing for our environment and its consequential effect on our planet surely we should be taking care of our Green Belt land – not building on it

And

- Having very recently left the EU – for obvious reasons, we need to RETAIN our much needed farming land and, once again, not build on it.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10234

**Person ID** 1268174

**Full Name** ELIZABETH ROLLINSON

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Devastating impact on our precious Green Belt</b></p> <p>The case for building on the Green Belt has not been presented. The Local Plan proposal is going against the protections established by the Government to protect the Green Belt and in this case, prevent the urban sprawl that would see the village of Northchurch become engulfed with Berkhamsted. Furthermore, we are concerned about the possibility of a new settlement of up to 3.400 houses between Wingrave and Long Marston - although not in the local plan yet, we worry that this could be adopted if the Planning Inspector imposes a higher Government Housing growth figure than Dacorum expect.</p> <p>The Government states:</p> <p><i>“The fundamental aim of <b>Green Belt policy</b> is to prevent urban sprawl by keeping land permanently open; the essential characteristics of <b>Green Belts</b> are their openness and their permanence.”</i></p> <p>[Reference: Protecting Green Belt land - National Planning Policy Framework ... <a href="http://www.gov.uk">www.gov.uk</a> › guidance › 13-protecting-green-belt-land]</p> <p>It seems that Boris Johnson’s ‘Build Build Build’ rhetoric has been forced upon Dacorum Borough Council which has had to spring in to action, working with out-of-date data, the outfall of an appalling algorithm, to provide a Local Plan that, as a result is ill-conceived and poorly thought-through. How can destroying the ancient hedges of single-track and narrow roads of Bell Lane and Darrs Lane, to build over the green fields of Northchurch be a good idea?</p> <p><b>The outrageous overprovision of housing, based on outdated data and with an appalling lack of regard for Affordable housing.</b></p> <p>1 Impact on Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC)</p> <p>85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty. Although the Council 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 (including that of the hugely important Chilterns Beechwoods SAC), will cause significant</p>

harm to the Green Belt and AONB. 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.

#### 1 Overprovision of housing

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, CPRE Hertfordshire has serious concerns regarding the sheer scale of proposed development. In our view, 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.

We also acknowledge that recent Government guidance on calculating housing need has been, at best, confusing. CPRE has been campaigning locally and nationally against the nonsensical algorithm method for calculating housing need. We firmly believe that housing need 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 our opinion, would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

#### 1 Underestimating potential brownfield regeneration opportunities

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.

#### 1 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

#### 1 Implications of withdrawal of St Albans Submission Local Plan

The Strategy assumes that large areas of Green Belt land east of Hemel Hempstead and in St Albans District will be allocated for residential and employment development as part of the Hemel Garden Communities project. The St Albans Submission Local Plan has recently been withdrawn from Examination as the Inspectors advised that it would not be found 'sound'. The proposed sites north of Hemel Hempstead (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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10239

**Person ID** 1268177

**Full Name** DAVID ROLLINSON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Devastating impact on our precious Green Belt**

The case for building on the Green Belt has not been presented. The Local Plan proposal is going against the protections established by the Government to protect the Green Belt and in this case, prevent the urban sprawl that would see the village of Northchurch become engulfed with Berkhamsted. Furthermore, we are concerned about the possibility of a new settlement of up to 3.400 houses between Wingrave and Long Marston - although not in the local plan yet, we worry that this could be adopted if the Planning Inspector imposes a higher Government Housing growth figure than Dacorum expect.

The Government states:

*“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.”*

[Reference: Protecting Green Belt land - National Planning Policy Framework ...

[www.gov.uk](http://www.gov.uk) › guidance › 13-protecting-green-belt-land]

It seems that Boris Johnson's 'Build Build Build' rhetoric has been forced upon Dacorum Borough Council which has had to spring in to action, working with out-of-date data, the outfall of an appalling algorithm, to provide a Local Plan that, as a result is ill-conceived and poorly thought-through. How can destroying the ancient hedges of single-track and narrow roads of Bell Lane and Darrs Lane, to build over the green fields of Northchurch be a good idea?

**The outrageous overprovision of housing, based on outdated data and with an appalling lack of regard for Affordable housing.**

1 Impact on Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC)

85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty. Although the Council 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 (including that of the hugely important Chilterns Beechwoods SAC), will cause significant harm to the Green Belt and AONB. 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.

1 Overprovision of housing

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, CPRE Hertfordshire has serious concerns regarding the sheer scale of proposed development. In our view, 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.

We also acknowledge that recent Government guidance on calculating housing need has been, at best, confusing. CPRE has been campaigning locally and nationally against the nonsensical algorithm method for calculating housing need. We firmly believe that housing need 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 our opinion, would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

1 Underestimating potential brownfield regeneration opportunities

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.

- 1 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

- 1 Implications of withdrawal of St Albans Submission Local Plan

The Strategy assumes that large areas of Green Belt land east of Hemel Hempstead and in St Albans District will be allocated for residential and employment development as part of the Hemel Garden Communities project. The St Albans Submission Local Plan has recently been withdrawn from Examination as the Inspectors advised that it would not be found 'sound'. The proposed sites north of Hemel Hempstead (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.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10246
<b>Person ID</b>	1268185
<b>Full Name</b>	Ms Elizabeth Dashwood-Smyth
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	During these Covid Times it would appear that local Council is taking extreme liberties with people's ability to show their opposition to activity which is being perpetrated under the radar.

Why is it necessary to ravage greenbelt land in areas such as Tring, Berkhamstead Bovingdon etc. Why is Greenbelt land now no longer considered sacred, when for years much has been lauded about its important place in society.

You cannot build on Greenbelt land if there is strong opposition or is that what you are relying on. Lack of opposition, treat us all like mushrooms and pass legislation during your zoom lock-in.

There is only one reason that our green and pleasant land is being raped and pillaged by you YES YOU!!!!!!Greed.

We need a new hospital yet we are ignored but you are quite comfortable in planning thousands of homes in Dacorum and incredulously IGNORE the need for a central hospital for West Herts.

Covid may have played into your hands but there are ways and means for the 'minions' to upset your golden apple cart.

If there had been public meetings you would be IN NO DOUBT that people who are living the areas affected ARE NOT HAPPY.

If the public are not able to show their frustration and opposition to these proposals in a way that demonstrably shows their opposition then this is unconstitutional and undemocratic.

I speak for my family friends neighbours. WE OBJECT TO THESE PLANS.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10265

**Person ID** 1153993

**Full Name** Eric Martin

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The housing element of the Plan is based on unrealistic target figures. The use of 2014 ONS data has, perversely, been continued, when later information is available. Even this later information does not take account of expected changes in demand for housing following Brexit and the lasting impact of the covid pandemic on working patterns and hence housing need. A Plan of this nature needs to be based on rational forecasts, not on unsubstantiated political targets.</p> <p>The Plan calls for large areas of Green Belt land to be sacrificed for housing. National policies make it clear that the desire to build housing is not an 'exceptional circumstance' which justifies the loss of Green Belt land. In this regard, of specific interest to me, is the inclusion of Rectory Farm, Kings Langley ('Growth Area' KL02), the development of which, as part of the previous Local Plan, was rejected by the Plan Inspector. The Plan should focus more on developing brownfield sites.</p> <p>Dacorum has declared a 'Climate Emergency'. Presumably this means that the Council is committed to preserving and enhancing 'natural' resources, in order to reduce 'climate change'. It is very difficult to see how concreting over large areas of Green Belt land is consistent with this policy.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10277
<b>Person ID</b>	399324
<b>Full Name</b>	Ms Julie Hollway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am a local resident in Northchurch and moved to the area given its rural nature and views over Green Belt (which I and the government want to protect). To ruin this will be to ruin the whole environment we live in and bring consequences we cannot reverse when we realise the error of our ways. Now is the time to protect where we live .. not suffer death by a thousand cuts to our beautiful and healthy environment.</p>

Dacorum is blessed with significant areas of Green Belt countryside, and market towns rich in history. Those towns and countryside offer significant amenities and benefits to residents. However, it is also an area which lacks significant infrastructure. There is no large hospital within the borough; the train service into London is already at capacity (Appendices to Interim Sustainability Appraisal Report, p.76 - see [https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-interim-sustainability-appraisal-report-appendices-november-2020.pdf?sfvrsn=6abe09e\\_4](https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-interim-sustainability-appraisal-report-appendices-november-2020.pdf?sfvrsn=6abe09e_4)), there are air pollution concerns (Appendices to Interim Sustainability Appraisal Report, p.22.), schools are full, and roads are increasingly clogged.

THE WHOLE LOCAL PLAN IS BASED ON THE WRONG NUMBERS.

The main justification for proposing to release such large areas of land from the Green Belt appears to be the numbers of houses required for Dacorum to build per year, as assessed under the government's 'standard methodology'. Yet the methodology appears to not agree with the National Planning Policy Framework (NPPF), in that it is not based on the most recent population data (using 2014 instead of 2018 figures) and leads to perverse results: Dacorum - an area with no large hospital or arts venue - has a higher assessed housing need than large cities such as Hull, Stoke, Reading or Wolverhampton. By contrast, the Campaign For The Protection of Rural England Hertfordshire (CPRE Herts) has assessed that a more realistic estimate of Dacorum's annual housing need is between 351 and 536 per annum (CPRE Herts review of DBC draft Local Plan,

<https://www.cpreherts.org.uk/planning/local-plan-responses/item/2645-dacorum-proposed-local-plan-has-unnecessarily-high-impact-on-the-green-belt>) – significantly fewer than the 922 dwellings per annum proposed in the draft Local Plan.

DBC overstate the housing need. The South West Herts Local Housing Needs Assessment Final Report - September 2020, a study by G.L. Hearn covering St. Albans and Dacorum, says on page 5: "Recommendation: There is no requirement for the Councils to increase the number of homes they plan for to support local economic growth."

There is therefore no reason or need for Green Belt to be ruined and these plans should be stopped immediately.

The government itself has acknowledged the inevitable impact of the pandemic on housing requirements (for example, increased remote working may well mean that more brownfield sites become available for housing), and confirmed in December 2020 that "meeting housing need is never a reason to cause unacceptable harm" to the Green Belt (Government December 2020 housing need consultation outcome). Rather, the standard methodology provides only 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 [...] our strong protections for the Green Belt".

The approach adopted by DBC in its current consultation appears to jump the gun: sites are included within the draft Local Plan in order to meet the numbers, with the consequence that the sites are slated for release from Green Belt, rather than it being first decided whether any release of land from the Green Belt is warranted.

SP2 ("Spatial Strategy for Growth") and SP3 ("The Settlement Strategy") are not agreed.

o The NPPF requires that "These policies do not recognise DBC's obligations under the NPPF to protect the Green Belt and preserve Green Belt boundaries, and to conserve and enhance Areas of Outstanding National Beauty. These policies are based on a misunderstanding of para 11 of the NPPF, that a planning authority must "make every effort to meet the

housing, business and other development needs of an area” (“Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth”, page 35). This is not what para 11 of the NPPF says, where obligations are subject to significant qualifications re Green Belt land and Areas of Outstanding Natural Beauty. The Town and Country Planning Act should be consulted for DBC to appreciate the misunderstanding.

The NPPF requires that “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” (NPPF, paragraph 172). DBC is thus under a legal obligation to take account of (and not only pay lip service to) paragraph 172 of the NPPF and to the CCB Management Plan when designing local plans which are within or which affect the Chilterns AONB. More generally, it is noted that DBC's proposals come at a time when the Glover Report (commissioned by DEFRA, 2019) have recommended that the Chilterns AONB should become England’s next National Park, making development which adversely affects the area at odds with national policy. (DEFRA Landscapes Review, final report; [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/833726/landscapes-review-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf))

o Dacorum's own currently applicable Adopted Core Strategy states that: "development will not be supported where it has an adverse impact on the sensitive open valley sides and ridge top locations" (Dacorum Adopted Core Strategy, 2013, paragraph 21.6 ).

o Obligations under the NPPF are also to protect and enhance biodiversity – relevant to, for example, the impact that the proposed level of housing growth in the area will have on protected chalk streams;

o The proposed level of housing supply growth in the borough will place unacceptable strain on local infrastructure and resources, some of which (e.g. train services) are outside DBC’s control, and will exacerbate already high levels of traffic congestion.

Residents have every reason to be outraged and angered 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.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10286
<b>Person ID</b>	1268236
<b>Full Name</b>	STEVE ROBERTS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>My family have been residents in Dacorum for over 40 years. My wife and I lived in Hemel Hempstead and Berkhamsted, while my son and his family live in Hemel Hempstead. I have recently retired from employment as the Strategy Director for a large international company which is one of the major employers of people living in Dacorum; this job has given me an insight into the motivation of people and businesses in the area. I have followed the discussions regarding the development of our community with great interest.</p> <p>Of the various documents which I have read, I find that the response provided by the Berkhamsted Residents Action Group is the best reflection of my views.</p> <p>I wish to note some specific points, as noted below.</p> <ol style="list-style-type: none"> <li>1 The bulk of the Draft Local Plan refers to new homes in Dacorum. The proposed total of over 16,000 new properties represents a massive increase over that put forward in the agreed 2013 Core Strategy. This increase requires the use of a substantial amount of "Green Belt" land. There does not appear to be any specific justification for this number of homes in terms of such factors as an increasing number of jobs in the area, nor is there any significant reference to the infrastructure required to support the massive increase in people who would live in our community.</li> <li>2 The lack of analysis and planning for future employment patterns in the area is a major omission, particularly in 2021 following the effects of the pandemic.</li> <li>3 The evidence is that the rise in population and housing demand in the area in recent years has been due to people commuting into London. The outcome of the current pandemic is likely to be an increase in home working and an increase in on-line shopping, both of which will result in more people coming into the region and staying in their home communities. The rise in the number of people generally milling around in the towns and the green areas in the past months has been noticeable, as has the deterioration in the local paths and bridleways. This trend will inevitably have its impact on the quality of life and will, indirectly, lead to increasing demand for local services and maintenance of the outdoor facilities (including roads and car parking in the green areas).</li> <li>4 The choice of locations for building development has a significant bias towards green field sites, many of which are on the higher parts of the region. This presents a significant increase in the demand for fresh water to reach points above the natural water table of the area, requiring increased power. None of this seems to match the growing aspirations for a Green Planet.</li> <li>5 The constrained valley siting of Berkhamsted will create additional problems for the transportation infrastructure around the region. Suggestions that many of the sites will have access to the A41 acknowledges the fact that the Plan is based on the previous assumptions regarding people living in dormitory towns in the area whilst working</li> </ol>

outside the region. As noted previously, some of the current assumptions need to be reconsidered in the light of the nature of society post-COVID-19.

- 6 The belief that people will walk or cycle from new development areas into the town centres is somewhat flawed. Observing behaviour in the past months, there have been many leisure cyclists and walkers, but very few of these have shopping bags. It is inevitable that more cars will be used. Assuming that these gradually become dominated by electric drive vehicles, the Plan makes no reference to providing infrastructure for charging these vehicles either in the town centres or in the new developments.

In summary, I feel that the Draft Local Plan is based on the incorrect assumption that the region needs a massive increase in its housing stock. There is no evidence presented to support this assumption, and the changing patterns of life following the COVID-19 pandemic would change any assumptions. Now is the time to take stock of the changes required, paying particular attention to what the future might hold and need, not what the patterns of the past suggested. Pressing ahead with the Draft Local Plan at this time will be viewed as an ill-considered act, putting at risk our beautiful region for the initial benefit of out-of-area land developers. A far-sighted review focused on the interests of the people and planet, coupled with implementation of some of the ideas of the 2013 Core Strategy, would surely be seen as the appropriate (and popular) response at this time of major changes to the status quo. This is the time to show imagination and adaptability, not dogmatic adherence to old business models.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10296

**Person ID** 1268252

**Full Name** MATTHEW MOJSAK

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I'd like to vehemently express my objection to the house building plan in Dacorum for the following reasons:

- inadequate provision for expansion of services to accompany the extra houses including:
- schools - there already are not enough spaces
- broadband BT network is already over stretched
- roads are already too busy and dangerous

- lack of cycling provision in safe lanes in Dacorum
- parking is already inadequate
- pollution in for example Berkhamsted high street already exceeds national safe levels - how will this be minimised?
- traffic in town centres and bypass
- the bypass exits at Berkhamsted and Boxmoor are dangerously short and with more traffic will be even more so
- train station and train capacity especially going in and out of London
- providing a sports centre in and attempt to compensate for a lack of the above is not adequate

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10303

**Person ID** 1207897

**Full Name** Mrs Linda Milne

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

We object to the building on the green belt. Why can't new housing developments be restricted to brown sites. Once the green belt is encroached upon it is gone forever.

We need green spaces in our community. When Hemel Hempstead was originally designed it was with green spaces in almost every road, now you are even thinking of squashing houses into garage spaces. Please think again on this matter. We understand that new housing is needed - what about converting shops into flats like the old Kodak building. More people are shopping on line so some retail space has been empty for years. Rather convert retail/ industrial space into housing.

I hope you take the above into consideration.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10304

<b>Person ID</b>	1207896
<b>Full Name</b>	Mr Keith Milne
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We object to the building on the green belt. Why can't new housing developments be restricted to brown sites. Once the green belt is encroached upon it is gone forever.</p> <p>We need green spaces in our community. When Hemel Hempstead was originally designed it was with green spaces in almost every road, now you are even thinking of squashing houses into garage spaces. Please think again on this matter. We understand that new housing is needed - what about converting shops into flats like the old Kodak building. More people are shopping on line so some retail space has been empty for years. Rather convert retail/ industrial space into housing.</p> <p>I hope you take the above into consideration.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10305
<b>Person ID</b>	1154031
<b>Full Name</b>	EMMA MARSHALL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>I am writing to wholeheartedly object to the plan for 16,000 homes which proposes to bring about a hugely negative impact in the area in which I live and work and raise a family and will see a devastating effect on local environment, wildlife, village character and life, commuting, roads and traffic and loss of green belt land.</p> <p>I object to these proposals on the following grounds:</p> <ol style="list-style-type: none"> <li>1. That the data and modelling being used for numbers of 16,000 houses is outdated. Using 2018 data, and not 2014 data would half the number of housing. Why is 2014 data being used?</li> <li>2. A loss of 850 hectares of green belt is completely unacceptable. Our green belt land should be protected and in these unprecedented times, the benefits of green belt land for mental and physical health have been a lifeline to individuals and families.</li> <li>3. Climate change - we live in a time where a climate emergency is upon us and this plan does not address the damage that will be caused and the irreversible implications that such housing numbers have.</li> <li>4. Water supply - we do not have enough water and so using supplies from the chalk water aquifer damages our rivers which are classified under the Natural Environment and Rural Communities Act 2006.</li> <li>5. Brown Belt - I would like to see proper investigation into the use of adequate brown belt land that can be used for housing needs.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10309
<b>Person ID</b>	1268339
<b>Full Name</b>	Mr Adam Craig
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Do you have any specific comments about the sustainable development strategy?</b></p> <p>The local plan says very little about sustaining villages. We want vibrant self-sustaining villages that are not just dormitory settlements. This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan – it has been called West Berkhamsted instead. The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology. There</p>

are fears among many neighbours that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10318

**Person ID** 1268350

**Full Name** Mrs Tamsyn Craig

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Do you have any specific comments about the sustainable development strategy?**

The local plan says very little about sustaining villages. We want vibrant self-sustaining villages that are not just dormitory settlements. This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan – it has been called West Berkhamsted instead. The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology. There are fears among many neighbours that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10333

**Person ID** 1268365

**Full Name** Ms Joan Errington

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>It shows nearly 17000 new homes in total to be built, this is great many people, say x that by 3. = 51,000 more people to be accommodated.</p> <p>Does the plan include facilities for this many extra residents, Doctors surgeries, schools, playgrounds , communal centre etc and where is the provision for a new hospital because decorum is bigger than Watford now and we will need extra beds, which I understand the refurbishment at Watford will NOT provide the extra beds required.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10339
<b>Person ID</b>	1268418
<b>Full Name</b>	JOSEPHINE O'NEILL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Water supply and waste water disposal</b></p> <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>Geographers say there are only 210 true chalk streams anywhere in the world and the Chilterns is home to 9 of these rare and precious habitats. The siting of housing must not be allowed to degrade these special places.</p>

The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This would take many years to complete, and be extremely expensive as well as disruptive to affected communities.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10356

**Person ID** 1268427

**Full Name** GRAHAM HAYNES

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

The plan exceeds the total requirement laid down by central government.

The Developer-led nature of these plans means that there are insufficient guarantees that issues of sustainability and infrastructure will be properly addressed.

In the event that all sites do come forward, there is no indication in the plan as to which areas will see fewer houses built to reflect the reduced demand.

The plan contains a disproportionate number of new homes in Tring. This is out of character for the market town and surrounding area. Given Tring's setting within an AONB it is difficult to see how this scale of development can be described as sustainable.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS10378
<b>Person ID</b>	493957
<b>Full Name</b>	Mrs Anne Galewski
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>Context</b></p> <p>DBC launched the consultation despite recent government acceptance that the algorithm figures being used to justify growth need are flawed and they will be reviewed. I wrote to my Berkhamsted MP Gagan Mohindra, and he responded confirming that this is an issue he is taking up with Ministers. He is one of a number of Home Counties conservative MPS who are unhappy with the situation on numbers. DBC should be challenging the figures with support from local politicians or not, not just blindly accepting the figures and rolling over, seeing increased revenues from council and business rates as the prize they crave. Arguably, half the number proposed is sufficient see ONS data from 2018.</p> <p>I have been a resident of Dacorum for @25 years and I care very deeply about the plans to build and develop on the precious commodity, being the AONB and green belt.</p> <p><b>Overall impact on Dacorum</b></p> <p>Looking at the population stats. of @155k, an increase of nearly 52k based on @17500 new dwellings means a population uplift of @30%. Most of this build will be on green belt and in close proximity to the Chilterns AONB.</p> <p>There is already substantial build agreed and with the proposed numbers the borough will become urban rather than rural in nature. As most of this new build is on green belt, any requirement to replace green belt will use up the rural area and maybe the AONB.</p> <p>As well as the obvious environmental impact, there will be physical and impacts on the AONB. Because of covid the AONB has seen a sharp rise in visits by people seeking open space and outdoor amenity, I have heard complaints from friends and neighbours trying to access both Ashridge and Wendover woods about the sheer volume of cars and people making it impossible to visit and park.</p> <p>Once the additional local residents and their vehicles are added to this then there will be serious management issues for the AONB, which as we are well aware is not a National Park, although this must become a prerequisite. What guarantees can the council and government give that this unique landscape will be protected and maintained for the</p>

future? Who will manage the influx of people and the impact on the environment? The National Trust who own and manage Ashridge are strapped for cash.

Most of the build will be to the north and east of Hemel Hempstead (11688), Berkhamsted (2230) and Tring (2730). All areas are close to the AONB, and the impact on these towns needs to be considered. Little recognition seems to have been taken of the topography, we are basically talking about a series of valleys and therefore any development on the top of the slopes is going to have a visual impact for many miles.

A new link road is proposed east to west in north Hemel, so traffic issues and noise, visual impact etc. are inevitable. The whole character of the Borough will be changed.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10379

**Person ID** 1267063

**Full Name** ANN CONROY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10394

**Person ID** 1268432

**Full Name** SARAH STUBBS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10421

**Person ID** 1268439

**Full Name** MARIANNE HARDING

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>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.</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. 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 &amp; 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 &amp; 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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10424
<b>Person ID</b>	334456
<b>Full Name</b>	Mr Martin Cotton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

- \* Yes
- \* No

**Spatial Strategy for Growth comment**

I am writing to you with some thoughts on the **Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth.**

In para 2.3 of the document, you state that: “One of the major challenges for the Borough is delivering a step change in the level of housing growth as required by the Government. This will be far above what has been delivered in the past...”

This trope of ever-continuing growth is echoed throughout the Plan. It would appear to go against the ONS household predictions as published in 2014, 2016 and 2018 (see attached extract from their reports) which imply a **decrease** in growth in Dacorum. Furthermore, it appears that the figures relied on in the Plan are based on outdated estimates from 2014, which were even higher than those in 2016, so the downward trajectory is considerably more pronounced. Quite how this selective reading of the figures can be allowed to proceed is baffling, to say the least.

Figure 2 on P.38 shows the Housing Trajectory 2020 – 2038. A useful comparator would have been the Housing Trajectory for the years leading up to 2020: was the amount of housing actually delivered during that time below or above expectations? And, if the latter, why are future plans not being curtailed, quite apart from the point in my previous paragraph? Again, there is an unwillingness to address the errors of the past.

I realise that Covid is mentioned towards the end of the Plan, but it will plainly have a lasting effect on how and where people live. I suggest that it may well make many of the projections in the Plan specious, if not totally invalid. Unfortunate timing, perhaps, but something that needs to be addressed before rushing headlong into something that will out of date before it has even started.

Overall, the Plan appears to take accelerated growth in the South-east in general, and Hertfordshire in particular, as a given. With the government talking about “levelling up” and trying to encourage growth in other parts of the country, this would seem to be going against national policy.

Accordingly, I believe that a major re-think is required on the areas of the Plan which I have touched on. Others will doubtless have made comments on different parts of the document.

**Included files**

[Copy of ONS projections 2014 2016 and 2018 Dacorum.pdf](#)

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10432
<b>Person ID</b>	1268441
<b>Full Name</b>	MARION GRACE MORRIS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>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.</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 &amp; 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 &amp; 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>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10446
<b>Person ID</b>	490196
<b>Full Name</b>	mrs alanah cullen
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</li> <li>- Over-provision of housing</li> <li>- Failure to address climate emergency issues</li> <li>- Impact on infrastructure and local community</li> <li>- Likely water and water waste disposal issues and damage to chalk streams</li> <li>- The lack of brownfield regeneration proposals.</li> <li>- The proposed use of green belt land, which should be protected for future generations.</li> <li>- Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny.</li> </ul>

- 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.

I reiterate my strong objection to the Dacorum Local Plan, which not only has not been available for scrutiny by the wider population of Dacorum due to the Covid-19 lockdowns, but is based on data that seems out of kilter for the new normal which will be a reality after the pandemic is beaten.

I urge a rethink and wider consultation with all sectors of the local population.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10450

**Person ID** 1268450

**Full Name** JOSEPH STOPPS

**Organisation Details** DACORUM GREEN PARTY

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The homes must be affordable. Building sustainable housing does not mean it becomes unaffordable. We welcome the commitment to genuinely affordable housing to be included in developments but believe affordable needs to be properly defined in the plan and must contain an adequate proportion of social housing. We call for the 40% minimum affordable homes objective to be enforced across the Borough.

We call for the 40% minimum affordable homes objective to be enforced across the Borough

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10461

**Person ID** 1264379

<b>Full Name</b>	John Whitton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Please take this email to register my objection and concerns to the proposals in the Dacorum Borough Council Emerging Strategy for Growth. In particular the large-scale proposed development in countryside and rural settings, the associated impact this will have on the local communities' rural and semi-rural environments, in addition to Environmental impacts.</p> <p>The plan does not accurately acknowledge or propose mitigation for increases in infrastructure, traffic congestion, water supply and disposal, and will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation.</li> <li>- Over-provision of housing &amp; subsequent impact on infrastructure and local community. In particular the scale of developments in Tring, Northchurch and Berkhamsted, and the assumed sublimation of Northchurch as "West Berkhamsted".</li> <li>- Reliance of out of date and inaccurate data to support the proposed volume of house builds per annum, latest ONS demonstrating far less need, and the apparent lack of consideration to both gradient or access to many of the sites particularly in Berkhamsted and Northchurch.</li> <li>- Developments that will not meet actual requirements (affordable or accessible homes) but will add urban sprawl and requirement for more vehicles to access amenities from edge of town (especially, Tring so remote from the actual town centre &amp; Northchurch developments atop steep sided single-track roads).</li> <li>- Quality of these developments – if we take as recent examples Bearroc Park in Berkhamsted and Roman Park in Tring these demonstrate a lack of vision or cohesion to their market town settings, and in both cases clearly rely on resident's use of cars to access amenities. A trend that looks set to continue.</li> <li>- Further impact and damage to the chalk streams, particularly the Bulbourne.</li> </ul>

- The Plan is out of date and at odds with 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 – and even if that doesn't happen the train services for commuters were in a woeful state prior to Covid.

- Additionally, I object to the manner in which this consultation has been conducted during the Covid lockdown with the resulting lack of visibility or opportunity to engage for so many residents. Sending posted leaflets with cartoon representations of these developments in the days before closing the consultation is risible.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10474
<b>Person ID</b>	1160842
<b>Full Name</b>	Caroline Manson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>1 Impact on Green Belt</b></p> <p>We need to be sensitive to the fact that the town sits within protected green belt and beautiful countryside, which is home to much wildlife and an area of outstanding natural beauty. By adding so many new houses, our town is at risk of becoming over-crowded and polluted for the people and wildlife who already reside here. The walks into our local countryside have never been more important for our mental health and well-being than during the lockdown periods of 2020 and 2021 and the proposed green belt sites across the town have been accessed by thousands daily during this period, when we have relied on staying local and getting out into our green spaces.</p> <p>The trees along the edge of the A41 also act at a 'green lung' for Berkhamsted – protecting the residents from both the noise and the pollution of traffic on the A41. Many of the proposed sites also sit high up at the top of the town and would therefore require new residents to drive everywhere to access the town's facilities, causing more traffic and pollution. A higher proportion of new homes should be built on brownfield land.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10482
<b>Person ID</b>	1268456
<b>Full Name</b>	Simon and Elisabeth Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; Rural Communities Act 2006.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10484
<b>Person ID</b>	1268457
<b>Full Name</b>	Samantha Cooper
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>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.</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. 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 &amp; 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10486
<b>Person ID</b>	1268460

<b>Full Name</b>	Nicola Nash
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS10489
<b>Person ID</b>	869129
<b>Full Name</b>	Ms Ann Hetherington
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p> <p>intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set</p>

out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10506

**Person ID** 1268607

**Full Name** PAUL AND CAROLYN EVERSON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>We would like to record our opposition to the proposed housing development planned for Dacorum.</p> <p>We have reviewed the documents issued for this development and it would appear that this is a strategy which was developed before the COVID19 pandemic and does not reflect the major changes in society which are currently happening as a result.</p> <p>One of the key changes in lifestyle is that people are no longer commuting into an office every day. Technology has enabled many people to work from home and the indication is that they will continue to do so after the pandemic has receded. There could no longer be the need to have access to London as workers are not restricted to living close to train routes or the South East of the country. There has already been a reduction of the number of people living in London and a growing trend to take advantage of cheaper housing in other parts of the country. There may no longer be a demand for expensive homes close to the capital in the coming years.</p> <p>Secondly the pandemic has shown that people need green spaces. It is extremely disappointing that all of the proposed developments are on Green Belt land. In normal circumstances this would be an environmentally destructive strategy, but in the current situation local green space has also become a vital lifeline to many people living in Dacorum's towns. The impact on mental health of the pandemic has yet to be assessed but the importance of green spaces for people has been clearly shown to have to lasting societal benefits, and we believe that this has proved that all efforts should be made to preserve and protect the Green Belt for the people of Dacorum.</p> <p>We believe that this proposal should be halted until a review of the impacts of the pandemic on society has been fully understood. Now is not the time to be embarking on an environmentally destructive building programme in Dacorum. At the next election we will be voting for the party that can recognise needs of the population of Dacorum and not continue with a dogmatic, unconsidered approach to building and its impact on the environment.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10520
<b>Person ID</b>	1264379
<b>Full Name</b>	John Whitton

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Please take this email to register my objection and concerns to the proposals in the Dacorum Borough Council Emerging Strategy for Growth. In particular the large-scale proposed development in countryside and rural settings, the associated impact this will have on the local communities' rural and semi-rural environments, in addition to Environmental impacts.</p> <p>The plan does not accurately acknowledge or propose mitigation for increases in infrastructure, traffic congestion, water supply and disposal, and will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <ul style="list-style-type: none"> <li>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation.</li> <li>- Over-provision of housing &amp; subsequent impact on infrastructure and local community. In particular the scale of developments in Tring, Northchurch and Berkhamsted, and the assumed sublimation of Northchurch as "West Berkhamsted".</li> <li>- Reliance of out of date and inaccurate data to support the proposed volume of house builds per annum, latest ONS demonstrating far less need, and the apparent lack of consideration to both gradient or access to many of the sites particularly in Berkhamsted and Northchurch.</li> <li>- Developments that will not meet actual requirements (affordable or accessible homes) but will add urban sprawl and requirement for more vehicles to access amenities from edge of town (especially, Tring so remote from the actual town centre &amp; Northchurch developments atop steep sided single-track roads).</li> <li>- Quality of these developments – if we take as recent examples Bearroc Park in Berkhamsted and Roman Park in Tring these demonstrate a lack of vision or cohesion to their market town settings, and in both cases clearly rely on resident's use of cars to access amenities. A trend that looks set to continue.</li> <li>- Further impact and damage to the chalk streams, particularly the Bulbourne.</li> </ul>

- The Plan is out of date and at odds with 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 – and even if that doesn't happen the train services for commuters were in a woeful state prior to Covid.

- Additionally, I object to the manner in which this consultation has been conducted during the Covid lockdown with the resulting lack of visibility or opportunity to engage for so many residents. Sending posted leaflets with cartoon representations of these developments in the days before closing the consultation is risible.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10521
<b>Person ID</b>	1268613
<b>Full Name</b>	VICTORIA WRIGHT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.</p> <p>The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste water disposal, will be felt across the whole borough and beyond.</p> <p>In particular I am extremely concerned about:</p> <p>- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation</p>

- Over-provision of housing
- Failure to address climate emergency issues
- Impact on infrastructure and local community
- Likely water and water waste disposal issues and damage to chalk streams
- 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10523

**Person ID** 1268614

**Full Name** DONNA HOGAN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I am writing to express my extreme concern and objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth, in particular the massive proposed development in the countryside and the impact this will have on the Community and the Environment.

The overall impact on the environment and infrastructure, including traffic congestion, water supply and waste waterdisposal, will be felt across the whole borough and beyond.

I am extremely concerned about:

- Impact on and loss of Green Belt land, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation
- Over-provision of housing
- Failure to address climate emergency issues
- Impact on infrastructure and local community
- Likely water and water waste disposal issues and damage to chalk streams
- 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10534

**Person ID** 1268621

**Full Name** EDWARD CADDIE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I write as a resident of Berkhamsted.  
 I would like to submit the following comments and observations to the above consultation.  
 The Emerging Strategy for Growth 2020-2038 (the Strategy) is a critically important proposal that will impact the local residents, the wider community, and our national legacy for generations to come. It is incumbent on us all to take a long-term, community-wide view and recognise the responsibilities of the stewardship role that we have inherited.

1 The strategy within the proposal is almost entirely dependent on the reallocation of Green Belt land, especially around Berkhamsted, to residential housing. This is detrimental to the environment and is wholly wrong.

- 2 The irreversible removal of Green Belt land is also unnecessary as it is based on flawed assumptions.
- 3 It is also contrary to national policy, the legal duties of Dacorum and contradicts the objectives of the Strategy itself. The NPPF guideline states that Green Belt land should only be permitted if there are exceptional circumstances and these must be justified. The document does not provide any credible justification for such exceptional status. There has been insufficient consideration given to the use of alternative brownfield sites and existing urban areas. There has also been insufficient consideration given to existing areas of Dacorum with better developed (or potential for development of the necessary) supporting infrastructure.
- 4 Under the proposal Berkhamsted, which is already recognised by Dacorum as possessing insufficient infrastructure currently, will face decades of problems until the infrastructure catches up with the proposed enlargement, if indeed this will ever be realised.
- 5 The number of new homes target is excessive, unsustainable, and based on an ill thought through national government policy which by its own admission is flawed and still under review, having already been fundamentally revised even within the period of this consultation.
- 6 The proposal appears to accept without challenge the arbitrary new build target from central government. It is incumbent on Dacorum representatives to critically examine the target and challenge it as robustly as possible. There have already been successful challenges from other authorities and via the courts.
- 7 The volume of new builds allocated to Berkhamsted and the surrounding Green belt land is wholly out of proportion to the history, nature, geography and supporting infrastructure. If not revised it would increase the number of dwellings in an historical market town by 24%!!
- 8 I refer you to the submission by CPRE Hertfordshire which demonstrates that based on more recent data the annual requirement is dramatically reduced from c922-1022 to c341-356.
- 9 Moreover, the policy of building increasingly large number of properties in the south east of England directly contradicts the government policy of 'levelling up' the United Kingdom and will only mean the 'North -South divide', with the associated damaging over-concentration of jobs, opportunities, transport, and environmental challenges in the south east, will be compounded not improved.
- 0 A high priority for the region and Berkhamsted in particular, should be to provide affordable housing and while this is referenced in the proposal, history and reality shows that in Berkhamsted, developments fail to include sufficient affordable housing – despite promises at the planning stage- and any developer contributions are redirected to other areas or infrastructure. Hence the aspiration is illusory.
- 1 The employment-generation proposals are under-developed. This is concerning for two reasons; the lack of ambition and planning by Dacorum will mean less economic growth and fewer opportunities for young people and secondly; the consequential further unhealthy concentration of towns like Berkhamsted into almost exclusively dormitory towns for London commuters.
- 2 There is no reference to the Glover Report commissioned by DEFRA which recommended the Chilterns AoNB become England's next National Park. This needs to be taken into consideration.

I conclude by restating Dacorum's own statistics which must be borne in mind:

- 85% of Dacorum is rural.
- 60% is Green Belt.
- 33% is within an AONB.

Dacorum and all its residents have an environmental duty and social responsibility to protect this unique area. It would be wholly wrong to permanently damage the region by responding to a short-term political initiative that may be revised or reversed. We should not and cannot prioritise an unchallenged and flawed need assumption for an excessive amount of housing over the protection of this Green Belt.

I respectfully ask Dacorum to reflect on the comments submitted by so many residents and organisations and revise the proposal before the pre submission Plan is submitted.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10537

**Person ID** 1268671

**Full Name** Mr Mike Jennings

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

The scale of increase in development considered for Tring is excessive, illustrating that the Local Authority has inadequate understanding of the highly distinctive character of Tring as a small, attractive market town.

Within the section delivering development around Tring it is developer-led, with input from the local authority lacking authoritative detail. The plans show a lack of understanding of the highly distinctive character of Tring town and the surrounding area, together with its current state and future needs.

Developer-led development is seen by local authorities as the cheapest way of providing development with only lip service paid to sustainability. This provides the local community with housing and infrastructure that the developer wishes to provide at a profit for their shareholders - not the development that a community deserves and this approach to development growth is not value for money if it does not deliver what is necessary to ensure a sustainable future.

The excessive scale of development exceeds even the government guidelines, which are currently being revised downwards, as widely reported in the media. Hence a 55% increase in housing for a small market town is totally inappropriate, given its setting within the AONB, and surrounded by Green Belt land. There can be no meaningful sustainable development strategy that will address the issues resulting from such a large increase. Whilst acknowledging that there is a need for development in Dacorum the draft plan is a wholly inadequate response to the challenges faced by the need for sustainable development. The plan lacks coherence, given that pressures from the existing population on the environment and its biodiversity are already causing adverse impacts. A large increase in human pressure will result from the DBC proposals and further deterioration on the local environment. The plan lacks the strength needed to address adverse impacts, both from current levels of stress on the environment and increased future impacts. This draft plan is governed by a developer-led strategy which will fail to deliver the necessary, but much reduced, sustainable growth that Dacorum and especially Tring deserve.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10556

**Person ID** 1268702

**Full Name** Kirstin Chaplin

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Do you have any specific comments about the sustainable development strategy?**

—The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.

— This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.

— Northchurch has not been recognised at all. It has been called West Berkhamsted instead.

— The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.

— There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10568

**Person ID** 1164729

**Full Name** David Clarke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10583
<b>Person ID</b>	1268722
<b>Full Name</b>	ALEX DEANE
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Please note my many objections to the proposals made in the Dacorum Emerging Strategy for Growth (2020-2038) documents:</p> <p>Regarding the broader plan for Dacorum:</p> <ul style="list-style-type: none"> <li>Your overall numbers have been based on the outdated 2014 ONS figures providing significantly overestimated figures. The updated 2018 ONS projections should be used to achieve correct, and significantly lower, calculations for the number of new dwellings needed in the borough</li> <li>The proposed loss in the draft plan of some 850 hectares of Green Belt, the wider countryside and urban green space to new development is <i>totally</i> at odds with the climate emergency declared by Dacorum Borough Council.</li> <li>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</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10639
<b>Person ID</b>	1268734
<b>Full Name</b>	RICH PETERS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I am emailing to object to the 2020-38 strategy and request that you go back to the drawing board, to ensure that adverse changes to green field sites are suspended and that brownfield sites only are targeted.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10652
<b>Person ID</b>	1268739
<b>Full Name</b>	SHARON ROSE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<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 &amp; residents parking.</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.

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** Spatial Strategy for Growth

**ID** EGS10667

**Person ID** 1161079

**Full Name** Melanie Llewellyn

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

The Plan does not achieve the objective it sets itself because growth will be accommodated 3-4km from the town centres. These, by definition are located at a distance away from "passenger transport and other services, facilities and employment opportunities". Paragraph 19.6 of the Plan does say "In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries.' But, beyond that statement there is absolutely no justification offered, except the Government 'target' that isn't actually a 'target'.

Indeed 19.7 also specifically states DBC have "identified those areas on the edge of the main settlements where exceptional circumstances exist", thus inferring that exceptional circumstance exist for the settlements protected by the specific Green Belt releases. These "exceptional circumstances" are certainly not evidenced.

BRAG have demonstrated that DCB is building a massive oversupply of housing compared to ONS estimates. Why? What is the justification?

DCB have underestimated the number of windfall developments by 56% this despite the likely impact of change of use as a result of different working patterns following on from the pandemic. The cost is 850 hectares of irreplaceable Green Belt land. It's almost as though the Council want to join up all the towns in a ribbon development to deprive them of their individual identities and their countryside.

As BRAG states :

“Statement 2 in SP2 starts “The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring”. BRAG is concerned about this wording as in its current form it suggests that ‘investment’ will be focused on Hemel Hempstead and that investment will be supported by the growth at Berkhamsted and Tring. Certainly, historically infrastructure investment in Berkhamsted has not matched housing growth, while the majority of funds raised through s106 from developers compensating for the failure to build affordable housing and the Community Infrastructure Levy (CIL) payments have gone into Dacorum’s coffers for funding investment elsewhere. With much higher CIL payments in Berkhamsted than elsewhere in Dacorum, it is easy to see the fiscal attraction of promoting development in Berkhamsted, but if that is a driver then it is wrong.” It’s also unjust.

Other key points:

23.119 accepts that “congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.

The new developments in Berkhamsted and Tring are so far from transport of other amenities that they cannot be justified sustainably, walking and cycling are not solutions.

The numbers proposed by DBC as a whole across the Borough are flawed. It worries me that the Plan has a target of ‘at least 2,200 new homes’ for Berkhamsted and Northchurch. The adopted Core Strategy identified growth of 1,180 homes over that plan’s 25-year lifespan, which equates to 47.2dpa. In reality, Berkhamsted has contributed to the Dacorum’s new housing stock at a rate of 61.9dpa – in other words completions have out-performed the target by 31.2% in Berkhamsted while new housing stock in Hemel Hempstead has fallen behind the town’s target by 9.3%. Much of this can be explained by developers’ demand to build in Berkhamsted rather than satisfying need, i.e. Berkhamsted growth is becoming developer led rather than planning led and this Draft Local Plan as proposed is facilitating that process. Another injustice. Besides which, if the housing was affordable then there would not be so much pressure to build in Berkhamsted. Developers are building not for the people who live here but from people moving in from outside the area. This represents a failure to implement the existing Plan and meet existing needs of people living in the area.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10686

**Person ID** 1268744

**Full Name** DAVID FULLER

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>The plan suggests that Berkhamsted and Tring take their 'fair share' of new housing. However that doesn't take into account the geographical constraints of Berkhamsted and the massive loss of Green Belt land.</li> <li>Development should be predominantly concentrated around Hemel Hempstead which is the natural centre of local employment, infrastructure, transport hubs, civic amenities etc.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10717
<b>Person ID</b>	1145421
<b>Full Name</b>	Mrs Shirley White
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>A lot of the new developments will be in "greenfield growth areas" 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</p> <p>Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10731
<b>Person ID</b>	1145586
<b>Full Name</b>	Miss Hannah Moynehan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1. The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10753
<b>Person ID</b>	1268754
<b>Full Name</b>	Mrs Rebecca Lumsdon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	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** Spatial Strategy for Growth

**ID** EGS10765

**Person ID** 1268756

**Full Name** Mrs Elizabeth Beningfield

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	<p>I oppose the Dacorum Borough Council local plan of major development of houses and new road within the area for the following reasons:</p> <p>The huge impact this proposal for development will place on green belt and areas of outstanding natural beauty that cannot be replaced, and also the surrounding villages this would destroy in its wake, with new roads that will bring even more traffic, leading to an enormous increase in pollution levels.</p> <p>The year 2021 is the United Nations climate conference in Glasgow. The Government, and O.B.C must be seen to set an example by protecting and nurturing all these areas, not only for ourselves but for future generations.</p> <p>After this most difficult year, one lesson we have all learned is how vitally important green belt and areas of outstanding natural beauty are for the mental health and wellbeing of everyone.</p> <p>This proposal simply must not go ahead.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10767
<b>Person ID</b>	1268759
<b>Full Name</b>	Mrs Catherine Rudin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.</p> <p>Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan</p>

in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement for a plan, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered.

The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead. The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10780

**Person ID** 1268762

**Full Name** Mrs Natalie Hill

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was</p>

appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10789

**Person ID** 1268763

**Full Name** Mr Michael Hill

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of

further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10804

**Person ID** 1268767

**Full Name** Erica Spanswick

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><b>Green belt grab insupportable and unjustifiable</b></p> <p>If implemented, these damaging proposals would result in the loss of <b>a massive 850 hectares of the Green Belt, the wider countryside and urban green space</b> 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><b>Housing type developer-led, rather than needs-led</b></p> <p>It is of great concern to me that in practice the prime consideration in site selection appears to be land availability rather than appropriateness or sustainability. This has led to many of the larger swathes of Green Belt that are earmarked for development being at some distance from town centres, employment hubs and public transport.</p> <p>I am also concerned about the very low number of social housing units included in the DLP, as distinct from “affordable”, which are often at 80% market rates.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10808
<b>Person ID</b>	1268768

<b>Full Name</b>	Amanda Stafford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.</p> <p>(6)</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10829
<b>Person ID</b>	1268791
<b>Full Name</b>	ELIZABETH FULLER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>• The plan suggests that Berkhamsted and Tring take their 'fair share' of new housing. However that doesn't take into account the geographical constraints of Berkhamsted and the massive loss of Green Belt land.</li> <li>• Development should be predominantly concentrated around Hemel Hempstead which is the natural centre of local employment, infrastructure, transport hubs, civic amenities etc.</li> </ul>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10840
<b>Person ID</b>	1145633
<b>Full Name</b>	Mrs Suzanne Nixon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>What is proposed does not stand up under scrutiny with regard to sustainability. The promises made sound impressive, but what will happen in reality.</p> <p>I believe development on this scale in the greenfield locations proposed is in itself unsustainable.</p> <p>Climate change is a reality. The UK has an ambitious and admirable target to reduce carbon emissions. Once again the issue of the scale of development arises here. The very fact of building on this scale will create high levels of carbon emissions. The loss of green spaces and increased volume of traffic will have a negative impact on air quality. There will be loss of habitat for wildlife.</p> <p>I agree with your statement that, "Development can help to mitigate and adapt to the impacts of climate change, through sustainable design and construction and reducing the need for travel, particularly by car." However, many of the sites proposed are remote from town centres and would result in increased traffic in already congested towns.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10867
<b>Person ID</b>	1152225
<b>Full Name</b>	GILLIAN JOHANSSON

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	1 Green Belt – During the pandemic the ability to take walks or go cycling locally within an Area of Outstanding Natural Beauty (the Chilterns) has been a life saver for many residents. It is likely that this appreciation of the local green belt will continue to be appreciated. To suggest that we should build houses on these areas – a precious resource – is difficult to support. With the perceived changes following the pandemic to shopping habits and working practices, current office and shop spaces should be utilised before encroaching upon the Green Belt because once it has been lost it will be lost forever. If demand still exists, then the Green Belt should only be used as a second priority rather than a first priority.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10870
<b>Person ID</b>	1268798
<b>Full Name</b>	BARBARA PAGE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	This plan delivers growth all right. Growth in housing, traffic, congestion and emissions. But it makes no specific provision for growth in local employment, passenger transport, education or sustainability. It is fundamentally a one-dimensional plan that neglects all the other elements of growth. By ignoring or making smooth, glib statements that pay lip service to passenger transport and employment local to the proposed new housing development sites, this plan promotes

increased high-carbon travel. It fails to balance the new housing proposals against the need to protect the town's historic setting.

The headline target of 'A minimum of 16,596 homes' is based on the Government's method of calculating housing 'need' for an area: however, this is not a strict target set by Government. These numbers CANNOT be used to take land out of Green Belt – they do not represent "exceptional circumstance". There are many reasons why this target is flawed. For example, Paragraph 9 of the 2017 DCLG "Planning for the right homes in the right places: consultation proposals" 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, Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest."

All of these environmental designations apply to the proposed development area. I have personally observed wild orchids, nesting buzzards, ancient trees and bluebell woods, and nesting skylarks in these proposed development areas - in the past week alone. These rare and unique habitats, once lost, will be gone forever.

In general, my opinions are in broad agreement with the arguments set out by the Berkhamsted Residents Action Group as set out in their associated submission dated 22 February 2021.

In particular, I agree with their 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 homes

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** Spatial Strategy for Growth

**ID** EGS10886

**Person ID** 1268804

**Full Name** Mr Mark Dixon

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

General Comment

A general comment with regards to the proposed sites as pointed out by the CPRE The Country Side Charity : 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty. Although the Council 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 selfassessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity (including that of the hugely important Chilterns Beechwoods SAC), will cause significant harm to the Green Belt and AONB.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS10887

**Person ID** 1268804

**Full Name** Mr Mark Dixon

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Brownfield sites should be prioritised for housing and only when developers have utilised all these spaces should our Greenbelt areas be considered. Developers have historically preferred green space due to the greater multipliers of financial return they bring but the Council should defend these natural resources for their existing residents.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10944
<b>Person ID</b>	1268880
<b>Full Name</b>	Ms Jo-anne Tunmer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I cannot support this plan and object heavily to this proposal as the delivery of the strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10952
<b>Person ID</b>	1268886

<b>Full Name</b>	Mr Paul Jayson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS10964
<b>Person ID</b>	1268889
<b>Full Name</b>	Ms Clair Sears
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I believe that the number of new homes included in the local plan is too just too many. It will have a detrimental effect on the local area.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS10983
<b>Person ID</b>	1162376
<b>Full Name</b>	Jade Holmes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p> <p>intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set</p>

out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11006
<b>Person ID</b>	333882
<b>Full Name</b>	Mr Mark Barfield
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.</p> <p>Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p>

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11023
<b>Person ID</b>	1268909
<b>Full Name</b>	Dr Leslie Kennedy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* <b>Yes</b>	
* <b>No</b>	

<b>Spatial Strategy for Growth comment</b>	<p>As per my statements above I consider the proposed development at Long Marston to be unsustainable. It is an area that will flood if 3000 homes are constructed and the existing road infrastructure around the site is already overloaded. There will be a detrimental impact on the surrounding roads in the adjacent Buckinghamshire villages including Wing, Wingrave, Aston Clinton and others including Pitstone and Ivinghoe.</p> <p>There is also the impact of the development on College Lake, Wilstone and Startops Reservoirs.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11040
<b>Person ID</b>	1145445
<b>Full Name</b>	Mr Jason McInerney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p>

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11055

<b>Person ID</b>	1268912
<b>Full Name</b>	SIAN FITZPATRICK
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock. This 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 simplistic 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 than this plan projects.</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</p> <p>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.</p> <p>Rather than as an afterthought, sustainability should be at the absolute core of the proposed future developments in the Local Plan, as recommended by national planning guidance. This draft Local Plan fails to demonstrate a pathway to local zero carbon or enhancements to biodiversity. The plan is unambitious and does not commit to any level of sustainability in its sustainability targets. The proposed plan has clearly prioritised house building growth over considerations for the climate emergency. 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 fine words, there is no evidence in the proposed Local Plan of a viable action plan to deliver such an approach.</p> <p>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.</p> <p>I call for:</p>

? The number of new houses proposed in the plan to be substantially reduced.

? 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.

? 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** Spatial Strategy for Growth

**ID** EGS11056

**Person ID** 1268912

**Full Name** SIAN FITZPATRICK

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	<p>In relation to the proposed sites, the volume of housing proposed to be built in Tring is too high and involves the destruction of large areas of local green space. Over the past year, this area has proved invaluable to local residents as an opportunity to access quiet and open green spaces and to lose this would have a huge impact on local residents and for many lose the reason why they chose to live in Tring in the first place. There is also a disproportionate volume of development proposed in Tring with approx. 55% growth compared to approx. 20% in Berkhamsted and Hemel Hempstead.</p> <p>I strongly object to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock. This 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 simplistic 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 than this plan projects.</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). There is little sustainable about the construction nor preserving of our heritage about this plan.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11080
<b>Person ID</b>	491395
<b>Full Name</b>	Mr Gordon Bluck
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I wish to object to the local plan in its present form for the following reasons:-

- Unless there is a demonstratable need for the proposed houses this proposed figure must be reduced to a more acceptable level, not just use of a “mutant” algorithm to pick a number out of the air. In any event in view of the high proportion of AONB and green belt land we need to concentrate on affordable starter homes.
- The plan is not clear enough as to how the Borough will work with developers and other stakeholders to mitigate loss of green belt and meet goals for climate change and biodiversity.
- The focus must be moved on to the use of brownfield sites in the main centres of Hemel Hempstead, Tring and Berkhamsted rather than sacrifice the green belt (which should only be used in exceptional circumstances).

Please include this in the consultation process.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11088

**Person ID** 1262172

**Full Name** Janice Boakes

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** The use of green belt land is wrong. The council should be looking for brown field sites. These should be used build affordable housing. There are clearly too many of the wrong type of homes in teh plan which in my opinion must be led by the developers rather than a structured approach to affordable housing.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11091

**Person ID** 1258923

**Full Name** Arthur Barfield

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.</p> <p>Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note</p>

that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11108
<b>Person ID</b>	1268939
<b>Full Name</b>	Ms Sylvia O'Brien
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p>

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11134
<b>Person ID</b>	1268956
<b>Full Name</b>	Mr John Bell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to submit my response to the Local Plan. I welcome the opportunity to contribute to this consultation and hope that you listen to my response and to that of other respondents, and look forward to seeing the revised Local Plan once all points raised are properly addressed.</p> <p>The Local Plan is clearly not fit for purpose for many reasons, with two being foremost.</p> <ol style="list-style-type: none"> <li>1 The increased housing numbers are based on outdated information, which leads to an unacceptable and irreversible impact on our natural heritage. The Local Plan must be re- drawn based on more recent information and with more respect for the Green Belt, Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC).</li> <li>1 The Local Plan must define the practical steps necessary to meet the DBC declaration of a climate emergency, and lay out how DBC will contribute to the UK meeting our international legal commitments to reducing emissions. At present, the Local Plan admits to the options being put forward having a negative impact on climate targets, which is the opposite of what is legally and morally</li> </ol> <p>The revised Local Plan must be based on evidence that is itself subject to public scrutiny. The current plan relies on aspirational growth strategies<sup>1</sup> and has led to a bias in the plans which must be addressed.</p>

In addition to the above, there are a number of other key considerations that need to be addressed when the Local Plan is re-drafted.

Thank you again for the opportunity to respond to this consultation. I look forward to DBC taking account of all the points raised.

Note that more detail on the points above is given on the following pages.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11171

**Person ID** 1262170

**Full Name** Julie Banks

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

- **Key developments**, generally I am concerned that existing communities are not at the heart of this emerging strategy, we already have examples of grid locked roads, neighbour disputes relating to parking issues, if these plans come forward we need to see the infrastructure in place to ensure the smooth flow of traffic. We need to see enhance parking spaces to enable residents to enjoy the peace of their own homes. Let alone hospital, schools, public transport and measures to reduce the impact of climate change.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11178

**Person ID** 1264551

**Full Name** Mark Somervail

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The plan is based on housing targets derived from the out of date housing projections from 2014 instead of the projections from 2018 which are much lower. It is completely unsustainable to destroy greenbelt based on incorrect figures. The NPPF says that green belt should only be used when absolutely necessary and all brownfield sites have been considered.</p> <p>The plan has not considered the more central brownfield site in Gossoms End which was originally earmarked for an unwanted 4th supermarket.</p> <p>The plan does not allocate a high enough proportion of affordable housing. This will result in the building of a smaller number of larger unaffordable properties which do not meet the demand. These larger properties occupy more land than affordable properties and thus waste green belt unnecessarily.</p> <p>The 2017 Emerging Core Strategy identified the areas of green belt between Darrs Lane and Bell Lane as essential to preserving the character of Northchurch as a rural village.</p> <p>The extra water run off from the impermeable surfaces in new developments will damage the River Bulbourne which is one of the few remaining chalk streams in the world. These chalk streams are naturally fed by clean water filtered through the chalk and are damaged by the dirty run off from developments.</p> <p>The sites south of Shootersway and between Bell Lane &amp; Darrs Lane are far from the centre of Berkhamsted. This will create even more traffic through Northchurch which is already a pollution hotspot. Developments need to be near to railway stations.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11196
<b>Person ID</b>	1268982
<b>Full Name</b>	Mr Andrew Yeomans
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I support the submissions of the Chiltern Countryside Group (CCG) and the Grove Fields Residents Association (GFRA) on this question.</p> <p>I believe the Local Plan fails to fulfil DBC’s statutory obligation under the Countryside &amp; Rights of Way Act 2000 s85 to ‘protect and enhance the [Chilterns] AONB’. The permanent destruction for development of large swathes of the Borough’s Green Belt adjoining the AONB and thus its setting, will certainly not be enhancements for the AONB.</p> <p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>The Ministry for Housing, Communities and Local Government stated: ‘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 are most appropriately located. In doing this they should take into account their local circumstances and constraints.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set</p>

out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamsted, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

I do not accept the vision for the market town of Tring as being sustainable when vast swathes of Green Belt, some top quality agricultural land, would be irretrievably lost to development of large housing estates outside the settlement's present boundaries nor the view that Tring should bear a more substantial loss of Green Belt than other areas within the Borough.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11223
<b>Person ID</b>	
<b>Full Name</b>	
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

- \* Yes
- \* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11237

**Person ID** 1268990

**Full Name** Mr Nick de la Bedoyere

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11257

**Person ID** 1268893

<b>Full Name</b>	Mr Martin Hopping
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11265
<b>Person ID</b>	221884
<b>Full Name</b>	Ms Eliza Hermann
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

## Spatial Strategy for Growth comment

I disagree with the proposed Sustainable Development Strategy because:

- it proposes a massive development programme of both housing and employment space that is not justified by need, that would remove 746 hectares of land from the Green Belt, and that would result in large-scale car-dependent urban sprawl;
- it proposes development in unsustainable locations on the edge of existing towns (Hemel, Berkhamsted and Tring) where development will impact negatively on the setting of the Chilterns AONB which is contrary to national policy;
- the proposals assume "Hemel Garden Communities" concept is warranted and should be taken forward, but there has never been a public consultation on the concept;
- the proposals assert that Berkhamsted and Tring must take on significant growth in housing numbers but this is not justified by the Council's calculations of housing need which rely on out-dated data and a flawed algorithm;
- it fails to sufficiently take into account the most sustainable form of development which is the regeneration and recycling of previously-developed, or brownfield, In particular, it fails to take into account the historical rate of 'windfall' housing delivery of 306 dwellings per annum (2006-2019) and 322 dwellings per annum (2017-2019) and the likelihood that this figure will rise even further due to the impact of the pandemic and of expanded permitted development rights for converting office and retail space to residential use;
- it fails to propose sufficient mitigation of the Climate Emergency, including failure to recognise the carbon sequestration benefits of the 746 hectares of Green Belt land and 104 hectares of greenfield land that are proposed to be built upon;
- it fails to sufficiently plan for existing let alone future infrastructure needs, particularly those needed for greener transportation including cycling lanes which are woefully absent around the Borough, and safe pedestrian pavements, footpaths and road crossing points for walking: many existing paths and pavements are blocked by parked cars, or are only wide enough for one person, and road crossing points are absent altogether at many locations around the Borough, making it difficult to go about one's everyday life on foot;

- it fails to plan for major utilities infrastructure upgrades that have been recognised for many years such as both clean water and waste water (sewerage) provision, and flood control including in town centre locations at Berkhamsted (including at the rail station);
- it fails to plan for sufficient community facilities and services beyond a nod to having some "open space" in new residential developments; community facilities means having safe and accessible indoor places for residents to socialise, hold meetings, exercise and come together to pursue common interests, and safe and accessible outdoor places for exercise and recreation for both children and adults;
- it fails to recognise the environmental damage to the Chilterns AONB and the Chilterns Beechwoods SAC from over-use by the large numbers of people walking and exercise there; this is at least in part due to the insufficient open space in town centres such as Berkhamsted.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11281
<b>Person ID</b>	1268994
<b>Full Name</b>	Mrs Julie Hopping
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11282
<b>Person ID</b>	1268994

<b>Full Name</b>	Mrs Julie Hopping
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11283
<b>Person ID</b>	1268994
<b>Full Name</b>	Mrs Julie Hopping
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	

<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11284
<b>Person ID</b>	1268994
<b>Full Name</b>	Mrs Julie Hopping
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11285
<b>Person ID</b>	1268994
<b>Full Name</b>	Mrs Julie Hopping
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Spatial Strategy for Growth comment</b>	
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11296
<b>Person ID</b>	1268998
<b>Full Name</b>	Mr Philip Hodgson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The proposals for Tring are hugely excessive. Will dramatically change and downgrade the quality of life for all residents. The number of proposed houses is far too large. Max of 50 houses per site.</p> <p>Total not to exceed 250 across whole of Tring. Town itself unable to accomodate a lot or extra people, no new parking, no wider street, greater congestion.</p> <p>Note change of Gov Policy not being included in plan.</p> <p>Halt the process and restart with a downward revised plan.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11309
<b>Person ID</b>	1269000
<b>Full Name</b>	Mrs Tracey Franklin
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Water supply and waste water disposal</p> <p>The proposed housing developments will put a huge strain on the water supplies to Dacorum and as such, there would be no other option but to extract additional water from the chalk aquifer. This in turn, would greatly further damage the Borough's precious chalk streams.</p> <p>The unrequired growth the Strategy proposes, would require substantial improvements to the current infrastructure of the town in order to improve transport (which will once again impact on the carbon footprint of the town) and treat wastewater and sewage.</p> <p>In summary, the town is not equipped to take this level of development unless huge and expensive improvements are made.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11328
<b>Person ID</b>	1269004
<b>Full Name</b>	Mr Kevin Coleman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

## Spatial Strategy for Growth comment

### Representation to Spatial Strategy for Growth (SP2) and the Housing Strategy (SP4)

Whilst we do not disagree with the broad settlement hierarchy in Policy SP3 that underpins Policies SP2 and SDP4, there is a lack of clarity and justification in the Plan that explains how the actual housing requirements for the different elements have been derived.

In particular, it is unclear as to whether the specific housing requirements that are set against each settlement in Policy SP2 have been derived from a 'bottom up' approach of site selection, that has then led to the numbers quoted, or whether the strategy has started from a notional distribution of the overall requirement of 16,600 homes between the various settlements which has then informed the site selection process.

There is no doubt that Hemel Hempstead is the 'highest order' settlement in the hierarchy, and offers the main opportunities for local employment and higher order services. But the strategy provides for 10,000 homes at Hemel Hempstead and only 2,000 at Berkhamsted, so is it the Council's case that Hemel Hempstead is effectively 5 times more sustainable as a housing location than Berkhamsted, or is it the case the Council has identified more sites for development at Hemel Hempstead? In concentrating so much of the Plan's delivery at Hemel Hempstead on a limited number of sites, this strategy also raises potential issues as it comprises a 'high risk' approach whereby any delay in delivery (in relation to matters such as land ownership, infrastructure provision and joint working) would have significant implications for the Plan as a whole.

Both Berkhamsted and Tring are grouped together in the 'second tier' of the hierarchy, but Berkhamsted is the larger town out of the two, and offers greater local opportunities for employment and service provision than Tring, but Tring has the higher housing allocation. How does the growth strategy account for the difference? The reality again seems to be that the availability of suitable sites substantially drives the Strategy, rather than the other way round.

However, when it comes to the larger villages, and particularly in the case of Bovingdon, it is known that the potential housing delivery from suitable, available and achievable and in the case of Duckhall Farm, deliverable sites exceeds what the Strategy suggests (240 units), as at earlier stages of Plan preparation, the Council has accepted that additional suitable sites exist (as evidenced by the meetings it had with respective developers/landowners in 2019/2020 and, despite its limitations, as remains evidenced by the AECOM Site Assessment Study work). Therefore if the Strategy is effectively being driven by site suitability and availability from a 'bottom up' perspective, rather than a notional 'top down' distribution, why is this approach not being similarly applied at the larger villages as it is for Hemel Hempstead, Berkhamsted and Tring?

The background Topic Paper on the Development Strategy that has been published alongside the Draft Plan states that “Growth is capped in Bovingdon to take into account congestion and parking problems on the High Street, and in particular, restricted scope to expand the primary school.” This factor would not constrain development at Duckhall Farm, as it lies within easy walking distance of the key High Street facilities, and traffic from the development would not pass through the High Street when entering/leaving the village for wider trips.

However, as per our separate representation to the Bovingdon Growth Strategy, the point about primary school capacity is simply not correct, as the analysis undertaken by EFM demonstrates, and in respect of the former point, if congestion and parking in the High Street are seen as a material constraint, it is wholly inexplicable as to why the growth strategy for Bovingdon should be allocating the site that is least accessible by walking and cycling, which is furthest from the village centre, and which is therefore most likely to *increase* congestion and parking in the High Street. Again, this

wouldn't be an issue with the Duckhall Farm site, as the distance to the school and the suitability of routes is conducive to walking.

Interestingly, the Topic Paper notes that Markyate is a relatively small village compared to Bovingdon and Kings Langley, and is a “relatively unsustainable location” compared to these other two key villages. How does the allocation of 215 new homes to Markyate in the growth strategy compared to 240 at Bovingdon reflect the fact that Markyate is viewed as inherently significantly less sustainable than Bovingdon?

We accept of course that under the SP3 hierarchy, the larger villages should be delivering a smaller proportion of the overall growth than the higher order settlements, but the evidence base does not provide any clear evidence to the effect that there is any material constraint that justifies the levels of growth being quoted, nor is there any internally consistent approach which explains the broad distribution between the tiers.

If the Strategy is indeed being driven by ‘bottom up’ site suitability, then it is essential that Policies SP2 and SP4 are clear on this and that these unit numbers are not then used in a ‘circular argument’ to in turn drive decisions about which sites should be allocated. As it currently stands, and as per our separate representations to the Bovingdon Delivery Strategy, the strategy for Bovingdon currently comprises one large (and poorly located) site, and one undeliverable site. The ‘bottom up’ strategy should identify a mix of deliverable sites to achieve an appropriate contribution from Bovingdon village.

If there is a 'top down' distribution that has guided the number of homes to be delivered in each tier, then this needs to be made clear, and the basis for the distribution set out and justified. If however it is essentially a 'bottom up' approach of site selection that then informs the Strategy, then again this needs to be made clear, and the criteria for the selection process made transparent. Without that explanation, these policies cannot be properly judged as to the soundness of the approach.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11342

**Person ID** 1269008

**Full Name** Mr Steven Kerry

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

*Policy SP2 – Spatial Growth*

The Emerging Local Plan seeks to deliver a minimum of 16,596 homes, or 922 homes per annum. The Government's recent publications of the new housing figures (December 2020 revised methodology) identifies a need of 1,023 new homes per annum in the Dacorum Borough. This totals 18,414 new homes to be delivered over the 18 year lifespan of the Plan. As such, it is considered that the extent of housing sought to be delivered over the emerging Plan period is insufficient and does not meet the full extent of need derived by the new methodology. For this reason, the policy is not considered to be 'sound'.

At point '2' of the policy, it states '*large scale development outside of the outside of the towns and large villages will be restricted.*' For clarity, it should be defined what 'small scale development' constitutes, whether it is a threshold of number of units or an assessment against the existing settlement size for example. This would provide more certainty regarding whether a proposal would be in accordance with Policy SP2.

At point 'f' of the policy, it states '*elsewhere in rural areas, housing development will be strictly limited. This is likely to be small-scale incremental development and should be principally in line with Policies SP11.*' As per the point above, 'small scale development' should be defined to avoid ambiguity.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11351
<b>Person ID</b>	221830
<b>Full Name</b>	Mrs Baerbel de la Bedoyere
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11364
<b>Person ID</b>	398597
<b>Full Name</b>	Mrs Caroline Freer
<b>Organisation Details</b>	Flamstead Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	It is very worrying that you are considering green areas in and around the towns which are such valuable open spaces for the general population to enjoy. Eroding so many areas will have an undeniable influence on the character of the individual towns and villages. Inflicting large housing estates on so many open spaces will change the nature of the market towns and villages for ever. It is also worrying that you are considering areas which are clearly on flood plains,

and whilst you mention that mitigating measures will be taken, are no lessons learnt from seeing so many houses under water during the recent heavy spells of prolonged and heavy rainfall? - which seems to the new weather patterns now with the effects global warming is having on climate change.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11376
<b>Person ID</b>	1207629
<b>Full Name</b>	Strategic Planning Department
<b>Organisation Details</b>	Strategic Planning Department Three Rivers District Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Policy SP2 – Spatial Strategy for Growth: TRDC supports Policy SP2 in its aim to direct development towards the largest and most sustainable settlements of Hemel Hempstead, Berkhamsted and Tring. More modest growth in the smaller settlements of Bovingdon, Kings Langley and Markygate is supported given the relative size, sustainability and local infrastructure provision in these settlements. Three Rivers supports the strategy of increasing densities in urban areas (subject to character and other site-specific factors) in order to protect greenfield sites as far as possible and to sustainably situate development in urban areas which generally have better access to services and transport.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11421
<b>Person ID</b>	1269025
<b>Full Name</b>	JOHN MAWER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>1 <b>Spatial strategy for growth</b> As a resident of a small village, I am all too aware of the creeping development that destroys the rural ambience. As referred to under the heading sustainable development, the vision is laudable, but the important thing is the tightness of policies and the wherewithal to apply them.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11435
<b>Person ID</b>	1264362
<b>Full Name</b>	Juliet Miller
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1.</p> <p>The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11492
<b>Person ID</b>	865014

<b>Full Name</b>	Mr Robert Turnbull
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( Changes in the Current Planning System of August 2020) prepared in this regard in 2020. It appears that the Council s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the councils inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11500

**Person ID** 1269116

**Full Name** Mr & Mrs S & J Ballantyne

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

* No	
<b>Spatial Strategy for Growth comment</b>	<p>The development strategy appears to just be led by the availability of sites presented to the council by landowners with no attempt to prepare a strategic plan based on analysis of real projected need, only the government targets which don't take account of local circumstances (large proportion of Green Belt and AONB, community need) It is surely only after objectively assessing the local level of need alongside these local constraints that the actual land required to be provided for the planned need can be ascertained.</p> <p>The current strategy simply looks like a developer/profit-led one and cannot in any way be described as 'sustainable'.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11511
<b>Person ID</b>	1269117
<b>Full Name</b>	ANITA PARRY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p>

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11525
<b>Person ID</b>	1269119
<b>Full Name</b>	JENNIFER BLOGG
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I am commenting on all sites here: 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty.</p> <p>Although the Council 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 (including that of the hugely important Chilterns Beechwoods SAC), will cause significant harm to the Green Belt and AONB. 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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11548
<b>Person ID</b>	1269122
<b>Full Name</b>	KATHRYN WHITTLE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper(" Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Heme! Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Heme! Hempstead.</p>

The housing needs delivery strategy was that Herne! Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11559

**Person ID** 1269123

**Full Name** KENTON WHITTLE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire , Bedfordshire and Buckinghamshire .

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper(" Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Heme! Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Heme! Hempstead.

The housing needs delivery strategy was that Heme! Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11592

**Person ID** 1269148

**Full Name** SIMON AND ANNA BARNARD

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

This Plan is all about development at any cost with scant regard to its effects on the environment and on existing settlements and residents.

The Plan is clearly **NOT** sustainable. With significant changes to priorities and attitudes arising as a result of Covid-19, climate change, biodiversity loss and sustainable transport, there is a need for a much more ambitious vision. There is a need to have specific strong commitments to maintaining and enhancing the Green Belt and the Chilterns AONB (possible future National Park) to maximise their benefits to the local environment and enhancing people's lives. It is simply **not** acceptable to allow major housing development and then try to create urban green space to compensate for the loss of natural open countryside. This will **not** maximise biodiversity net gain nor wildlife enhancement.

In relation to the Chilterns Beechwoods SAC, **no** impact should be permitted as a result of new development. It is **not** acceptable to allow impacts and then try to mitigate them. The vision needs to be more definitive and not take a vague 'as far as possible' approach to protecting the local environment.

Given the exit of Britain from the EU there is added emphasis on becoming more self-sufficient – especially in food production. Yet the developments around Hemel Hempstead and Tring will result in the loss of good quality agricultural land. This will further affect climate change and biodiversity.

The Plan fails to take into account the recent Government announcements to revise their housing targets, possibly downwards, due to reduced immigration and falling birth rates. This Plan goes against Government announcements about 'levelling up' and encouraging more development in cities in the north of England in order to protect rural areas in the south east.

The Borough is highly constrained by Green Belt and AONB, yet most of this new build will be on the Green Belt and in close proximity to the Chilterns AONB. There are already substantial new housing developments agreed on former Green Belt land under the existing Local Plan, and with the proposed additional developments the Borough will become urban rather than rural in nature. The devastation of the Green Belt around Tring, Berkhamsted and Hemel Hempstead which abuts the Chilterns Area of Outstanding Natural Beauty (AONB) is significant, with the loss of over **880ha** of Green Belt land. There is no clear attempt to mitigate this. The Chief Executive of the Wildlife Trusts has recently said: *'We live in one of the most nature depleted countries in the world, which is why we have a big ambition to protect 30% of land and sea for nature by 2030'*. The Prime Minister, Boris Johnson, is a fan of rewilding, and Dacorum Borough Council should be ashamed that the protection and enhancement of the environment and wildlife in the Borough is taken so casually. It is not sufficient to 'take into account' sensitive views, landscapes and protected environmental sites. These need to be robustly protected and enhanced through the creation of extensive buffer zones and establishing substantial habitat links between isolated wildlife sites.

Covid-19 has changed the face of how we work, shop, play and travel. This has not been taken into account, another indication of a very poor and unsound Plan. No account has been taken of the Council's own consultation 'Learning from Lockdown' which investigated how people's behaviours have changed during the Spring Covid 19 Lockdown and *'how we can learn from this, moving forwards towards a greener future...'* Dacorum has not learnt!

The collapse of the retail sector and the increase in people working from home will result in a glut of commercial properties which can be converted into residences. At the present time, the long-term impacts of Covid-19 on the retail industry indicate that online shopping will continue even when the lockdown and various restrictions have been lifted. This has been encouraged by the government with a change in the permitted development legislation, yet the Plan seeks to create additional retail floorspace! This is a complete joke. Many businesses have ceased trading, leaving a considerable number of empty properties. Therefore, use of these for residential purposes will reduce the number of new-build dwellings resulting in the retention of the Green Belt, yet only **23%** of housing development is proposed on brownfield sites – hardly a sustainable approach! Therefore, this policy must be reviewed.

One of the consequences of the COVID-19 lockdowns is that Dacorum has seen a sharp rise in visits by people seeking open space and outdoor amenity, with a vast increase in the volume of cars and people visiting Ashridge and other public open spaces. With the loss of some 850 ha of Green Belt and greenfield land, the pressure on the remaining open space will be intense. As well as the obvious environmental impact on the land and its flora and fauna, there will be physical and visual impacts on the AONB. Once the additional local residents and their vehicles are added to this there will be serious management issues for the AONB which maybe designated a National Park under the Glover Report. There appear to be no plans to safeguard this unique landscape, with development proposed up to its boundary in some cases. The Government, if not Dacorum, is taking the plight of the AONB seriously as in their February 2021 consultation on changes to the National Planning Policy Framework, is proposing to add a specific reference to the impact on the settings of AONBs into paragraph 172.

There are 59,938 households in the Borough at present, with 15,658 new ones planned in just 17 years – a 26% increase, with a population increase of some 30% in a very limited time span! The Council has taken the 'one size fits all' approach with merely tacking on largescale developments around the edges of the three main towns with little concern about the effect that the massive increase in building and population will have on the existing towns and their residents. Little recognition seems to have been taken of the topography, especially Hemel Hempstead and Berkhamsted – both built in river valleys which have steep sides. Therefore, not only will any development on the slopes have a visual impact for many miles, but they can hardly claim to be sustainable. Development on the fringes of towns will be some considerable way from existing facilities and transport hubs which are on the valley floor, resulting in more traffic, congestion on existing roads, disturbance, noise and pollution. Given the steep slopes and distance from facilities, walking and cycling is not an easy option, and there is little or no public transport to these areas. 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 land in Dacorum.

A new link road is proposed east to west in North Hemel Hempstead, so traffic issues such as noise, pollution, disturbance, visual impact are inevitable. This road will take traffic from the proposed new development called 'Hemel Hempstead Garden Communities' through the countryside which is AONB, through rural villages and across narrow bridges which already suffer from existing traffic. This new road is only required because of the proposed amount of development on the edge of Hemel Hempstead, but its consequences will be far reaching and severely detrimental to the surrounding areas well beyond the proposed boundaries. These are not even considered in this Plan. Yet, as the way people will live their lives after the pandemic with a drop in commuting and day to day travel, there will no longer be a need for a sizeable new link road.

The whole character of the Borough will be changed. The small market town of Tring is expected to absorb a 20% increase in residents, bolting a new “village” onto it with little attempt to integrate with the existing historic

town. Berkhamsted, also an historic but larger market town, has a proposed increase of around 10% on top of the new Bearroc developments of over 200 new houses, which is already creating traffic issues along Durrants Lane and Shootersway given that it is located on the ridge and some way from the town centre and station. Hemel Hempstead will virtually join with Redbourne which the very function of the Green Belt aims to prevent, and it is already being extended into Green Belt with two large developments (land west of Hemel Hempstead and Marchmont Farm) adding some 1450 dwellings in the next couple of years.

It is commendable that the Council aims to be carbon neutral by 2030 and has an aim for a biodiversity net gain of 10%, this Plan will certainly NOT deliver it! It fails to prioritise restoration, enhancement and creation of wildlife habitats across the Borough to reverse biodiversity decline in any meaningful way. The Borough contains internationally important chalk streams, Beech woodlands and chalk grasslands which should be acknowledged and their conservation prioritised, instead of being merely a vague and meaningless afterthought.

Keeping Green Belt land green and open makes a positive contribution to the fight against climate change. Climate Change will be exacerbated with more and more development on greenfield land away from community facilities and transport hubs and the Council has clearly not learned from their own Lockdown survey of the way that life has irreversibly changed. It is ironic that in virtually all development sites there is mention of wildlife corridors, green and blue corridors and public open space, but they are building on exactly those areas. So how can there be an increase? There is no reference to the habitat that has been and will be lost and how the Plan intends to make a significant contribution to habitat recovery. The Council needs to commit to improving the resilience of the local environment to climate change, yet it still intends to build on known floodplains and water meadows.

The strategy must include an objective to reduce land removed from the Green Belt to an absolute minimum, and exceptional circumstances must be clearly demonstrated. The Council sees the use of the Green Belt as an easy option, and it should not bow to pressure from the house building companies that own the land. The Council should be distinguishing between housing need and housing demand, and arguing against the inflated housing figures or perhaps the reason they don't is because they get income from developments?

The proposed housing target of over 800 per annum is excessively high when compared to the 433 required in the previous Local Plan. In such a highly constrained district, this increase is not achievable without significant loss to the Green Belt and open space in and around the towns and, in particular, these increases would have significant impacts on the character of Berkhamsted and Tring and the people who currently live there. It is bizarre that as it stands, the Borough has a higher housing target than some of the cities in the north. In an area with national designations and aspirations to become a National Park, this cannot be acceptable. In view of the proposed changes to the planning system and the methodology for assessing housing needs, the Council **must** seek to reduce these numbers and not just accept them as a fait accompli. This would be consistent with the Government's 'levelling up' agenda, reducing

housing in the south east and increasing housing in the north and if the Green Belt sites are not required to meet reduced housing numbers, then the argument of exceptional circumstances would be unlikely to exist.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11628

**Person ID** 1158198

**Full Name** JACK ARMSTRONG

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** It's on green belt land and should be protected forever.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11658

**Person ID** 1269152

**Full Name** SIMON RHEAD

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

## Spatial Strategy for Growth comment

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11674

**Person ID** 1269212

**Full Name** PETER SCOTT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The plan must ensure adequate Social Housing, which is net zero in operation, as defined in our answer to question 1.

The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS11705
<b>Person ID</b>	1269217
<b>Full Name</b>	Mr David Hulse
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p> <p>intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set</p>

out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11720
<b>Person ID</b>	1152494
<b>Full Name</b>	MRS G RUSSELL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>re Policy SP2:  Re 1: The minimum of 16, 596 homes is a gross overestimate, and based on outdated data on requirements. In any event, these cannot be delivered without contravening legal duties to the Green Belt, Chilterns Area of Outstanding Natural Beauty and Chilterns Beechwoods Special Area of Conservation.  The new housing that is needed is truly affordable homes, but not 16,596 homes.  Also there should be a recognition that the area is already over-developed, and that new growth should be focussed in other parts of the country, where it is needed.</p> <p>Re 3c: "Tring":  The growth proposed and the resultant infrastructure required would change the character of Tring completely, and put intolerable pressure on its green spaces, and the Chilterns Beechwoods SAC and the AONB. The infrastructure is already inadequate, and dealing with this issue would be sufficient development for the town, and its role in providing services for nearby villages.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11737
<b>Person ID</b>	1264100
<b>Full Name</b>	Ellie Ansell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I'm writing to object to The Local Plan proposal which destroys the green belt in order to build more housing. There's no point to a 'greenbelt' if it's built on anyway, and given the climate emergency I can't understand why this has been a proposed option. Also, I only found out about the plan via Facebook - there hasn't been enough publicity through means such as leaflets in the post.  No need to reply, I simply wanted to state my objection as one of the many others who are opposed.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11750
<b>Person ID</b>	1269233
<b>Full Name</b>	CIARA KENT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11764

**Person ID** 1118045

**Full Name** Mr Pdraig Dowd

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I have reservations on other aspects – volume and density, impact on environment, climate and pollution, transport infrastructure and its future, resulting population growth on all services, who ensures that it happens and who pays for it, etc.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11772
<b>Person ID</b>	871625
<b>Full Name</b>	Mrs Clare Francis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11810

**Person ID** 398725

**Full Name** Mr Valter Johansson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

1 The Emerging Strategy for Growth is based on outdated information (ONS 2014) instead of ONS 2018 data, which has now become outdated due to the pandemic and Brexit, especially as a recent article in The Times claims the UK population has decreased over the past 2 years. In addition, the new Conservative Government

under Boris Johnson is planning significant changes such as moving more activities to the Midlands and the North as well as significant environmental policies to reduce carbon emissions, the environmental impact of housing, traffic, flooding and water/waste water supply. None of these are reflected in the Dacorum Local Plan. Therefore, given the above, we believe that the Emerging Strategy for Growth figures need to be updated to reflect the current and revised future situation not the past.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11815

**Person ID** 1205265

**Full Name** Mr Paul McCann

**Organisation Details**

**Agent ID** 1123925

**Agent Name** Mr  
Les  
West

**Agent Organisation** Director  
Les West Planning

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

Yes

**Spatial Strategy for Growth comment** CALA Homes supports the Council's strategy in policy SP2 to provide additional housing in all the existing main settlements of the borough including Berkhamsted.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11824

**Person ID** 350823

**Full Name** Mrs Sue Yeomans

**Organisation Details** Chairman  
Chilterns Countryside Group

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The Sustainable Development Strategy and the proposals of the Local Plan are not fit for purpose. I fully endorse the response of the Chiltern Countryside Group to this question.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11837
<b>Person ID</b>	1266025
<b>Full Name</b>	PAULA GREENAWAY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I would like to raise my objections to the ritual stripping of our open spaces and green belt. Has this past year not been a wake up call for us all about the need for space. There should be enough brown field sites available to more than cater for your needs. All our beautiful villages are being eradicated by the wanton disregard for people and for our wildlife .No a new wildlife area incorporated in a housing development is not adequate
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11839
<b>Person ID</b>	1269253
<b>Full Name</b>	NIKKI GREENAWAY

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>DBC are using out of date projections and figures that do not effectively reflect the true demand, the figures are falsely inflated.</p> <p>The current quotas are not sustainable and I feel strongly that DBC are simply choosing the easy targets without given due consideration to an innovative approach.</p> <p>The encroachment on green spaces is unacceptable. We are already seeing the loss of amenity greens and garage spaces to fulfil quotas resulting in the destruction of important green areas. These are valuable to people's mental well being and this will result in communities being locked into bleak, concrete jungles as the trees and green spaces are being torn down. This was not the vision of the New Towns and whilst I appreciate that times have changed and demand for housing has grown council need to be mindful about what drives people to settle in Hemel Hempstead and it's surrounding areas.</p> <p>Most people are attracted to the area because of its proximity to transport links coupled with the fact that, unlike London, there is still a large proportion of green areas. These green spaces are not just in the surrounding villages but also acting as separation between the large neighbourhood estates throughout Hemel Hempstead. But by bit Infill building is closing these valuable green corridors. The impact on people but also the wildlife is irreversible. The wildlife have no where to go, the mature trees are being ripped out and we are seeing unprecedented issues with flooding caused by the amount of building taking place. I live in a very green area of Hemel Hempstead on the edge of town and we do not have sufficient water pressure to the extent that every Summer for the last two years my tap runs dry at 6pm at night. The water company have confirmed that they cannot supply enough water to meet demand when everyone comes home from work! This is 2021 in a modern road in a large town. How can we even consider building at these numbers without any significant investment in infrastructure.</p> <p>I try to visit family in Apsley on a weekend, I would be interested for council to look at traffic feasibility studies. It takes over an hour to move through the 3.5 miles at lunchtime on a Saturday. This is the result of poor planning decisions and inadequate road links- how do council feel that adding to this issue would not cause even more pressure and strain?</p> <p>The plan includes unacceptable impact on our green corridors and villages. There is no consideration for the current climate emergency or the impact on biodiversity. In times of rapid decline of natural species and habitat the plan makes sobering reading. The use of green belt land as a suggestion is criminal and another example of the lack of constructive consideration of alternative schemes. I am astounded by your proposal to ignore and blatantly disregard the historic value of our surrounding villages and settlements. Houses need to be provided and efforts needs to be made to hit your</p>

government quotas but why would you consider obliterating our villages ? There can be absolutely no reasonable excuse to drop hundreds of houses (and the associated chaos that building brings with it) in to villages or small market towns that can't cope with their existing traffic issues.

Selecting a field on the edge of a village or small market town is lazy and lacks real knowledge of exactly what people require to live happily and healthily through such challenging times. People have settled here to appreciate the natural world that we are lucky to have, often travelling in horrific conditions to a high rise office in the city, working 14 hours or more to come back to a home where they find peace and green spaces to enjoy in their limited free time- not to find it takes them an hour to navigate the traffic to go and get their food shopping. Imagine waking up to find that the green space that you and your family valued as a welcome sanctuary was destroyed and you now had a huge estate in its place.

I am astounded that in times of such mental health crisis and with such public awareness of the importance of green space Dacorum Borough Council have ignored all of these resources and feel that it is appropriate to ignore the wealth of research available. There is no adequate consideration of the climate emergency and no tangible understanding of the purpose of the original 'green belt' as a buffer to protect and preserve the identity of our areas, this prevention of urban sprawl has been disregarded in this plan.

The pandemic has changed the way that people work and the way our high streets will need to adapt. DBC have a real opportunity to look at the ways in which town centre and brown field sites can be regenerated. Towns do not need multiple charity shops or empty units, these could all be repurposed into affordable housing units.

Dacorum Borough Council you have a real opportunity to do something groundbreaking and innovative- be brave, don't use the easy route of urban sprawl and green belt grab....have the courage to withdraw this plan and come back to the drawing board with a truly collaborative approach. St Albans have been brave enough to revisit their plan, you are our elected representatives so please listen to us. You may have less responses than expected but perhaps that is a reflection of how disengaged people are. You have the responsibility to engage and help your residents to have a real say in the future of this town, change is inevitable but it takes a brave and determined number of individuals to make that change for the better rather than making an irreversible error that could blight this town for our future generations. Is that the legacy you wish to leave?

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11840
<b>Person ID</b>	1269254
<b>Full Name</b>	ALAN GREENAWAY
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I would like to object on any further development on green spaces.</p> <p>The last year has seen accelerated change in the demographics of the way we are now and will be living in the future. There are a number of retail, office and industrial units no longer occupied or not fully occupied. Dacorum has already seen change development take place in a number of old office units and retail units providing much needed housing developments and flats.</p> <p>Also some out of town office space is also being developed for housing</p> <p>The volume of square metres available will only increase due to the demise of some well known retail outlets ie Debenhams and the Arcadia group.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11855
<b>Person ID</b>	1269267
<b>Full Name</b>	Mrs Susan Bryant
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to you in order to take part in the current consultation process for the Borough's Local Plan 2020 – 2038, 'Emerging Strategy for Growth'. I am writing to formally record my OBJECTIONS.</p> <p>I am copying in our Member of Parliament, Mr Gagan Mohindra MP, to help to bring to his attention the level of concern within his constituency regarding the proposals contained within the Local Plan. I am also copying in my Parish Councillor, Cllr Lara Pringle by way of information.</p>

Others with greater technical knowledge and expertise than I, will have already recorded their specific objections in more detail, but I am writing to formally add my voice to their concerns regarding:

**The Local Plan’s devastating impact on our precious Green Belt**, the Chilterns Area of Outstanding Natural Beauty and the Chilterns Beechwoods Special Area of Conservation;

**The outrageous overprovision of housing, based on outdated data and with an appalling lack of regard for Affordable housing** plus a failure acknowledge the National Planning Policy Framework which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB;

**The huge impact on overstretched infrastructure** that the proposed increase in housing will have, including the burden on already overstretched medical services.

**The burden on our local Water supply and sewage disposal systems.** The precious River Bulbourne, a nationally important chalk stream and one of only 210 chalk streams in the world is already under threat, as is our overburdened chalk aquifer;

**The woeful failure to address climate emergency issues** despite DBC itself declaring a climate emergency.

I have lived in Northchurch Parish for over 20 years and I believe it is our duty to help protect for future generations the wild areas, Green Belt and the waterways that make this part of Hertfordshire such a special place.

It seems that Boris Johnson’s ‘Build Build Build’ rhetoric has been forced upon Dacorum Borough Council who has had to spring in to action, working with out-of-date data, the outfall of an appalling algorithm, to provide a Local Plan that, as a result is ill-conceived and poorly thought-through. How can destroying the ancient hedges of single-track and narrow roads of Bell Lane and Darrs Lane, to build over the green fields of Northchurch be a good idea?

I am hoping that as our MP, Mr Mohindra will hear the voices of your constituents and challenge Government and the proposals within the Local Plan.

As you say on your website:

*“My sole focus now is to represent the constituents of South West Hertfordshire and as a legislator, to scrutinise, support and hold the government to account in the days, months and years to come. “{Ref: <https://www.gaganmohindra.org.uk/about-gagan-mohindra>]*

Thank you for taking note of my Objections to the Local Plan 2020 to 2038.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11866
<b>Person ID</b>	1269275
<b>Full Name</b>	KALLIOPI KOUTSOU
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11876
<b>Person ID</b>	1269276
<b>Full Name</b>	GILBERT GRACE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><b>An Inhabitant and Business Person</b></p> <p>I am very much a Tring person as G Grace and Son dates back to 1750.</p> <p>I moved above the Tring shop in 1947, from where I used to watch the High Street.</p> <p>I remain keen on Tring, still working full-time at 84. This is because my son died tragically, and I have kept going to encourage my grandson Jordan to take over the High Street shop. This has worked out, and if he took full responsibility from this January.</p> <p>Naturally I am keen that he is able to succeed, which is why I write this report.</p>

### Dacorum Local Plan

I am in receipt of your local plan. 2020 to 2038

First of all, I would like to congratulate the team that put this document, together.

It has been well thought out and is well presented.

It is very helpful to have a long term Plan, thus avoiding a disorganised development in bits.

It is appreciated that you are under Government instructions to provide additional dwelling, so you do not require too much negativity.

I am pleased to see greater consideration is being given to cycle paths.

Opening up your plan to page 6. My first reaction was that the expansion of housing of 2731 was excessive. It is too high a % on the existing. I therefore turned to page 16 to find out where such development would occur.

#### Included files

#### Title

Spatial Strategy for Growth

#### ID

EGS11886

#### Person ID

1269277

#### Full Name

DEFINE PLANNING AND DESIGN LTD

#### Organisation Details

#### Agent ID

#### Agent Name

#### Agent Organisation

#### Yes / No

\* Yes

\* No

#### Spatial Strategy for Growth comment

**Housing Requirement and Supply:**

Minimum Housing Needs:

Part 1a of Policy SP2 outlines that the plan will make provision for a minimum of 16,596 homes in the plan period (2020 - 2038). That equates to 922 dwellings per annum (dpa), which DBC states reflects the Borough's Local Housing Need (LHN).

However, when calculating DBC's 2021 LHN in accordance with planning practice guidance (PPG), it is calculated at **1,025dpa**. That updated position should be taken into consideration immediately, with the 'Housing and Economic Needs Assessment' PPG stating that changes in LHN should be taken into consideration up until the plan is submitted for examination. Thus, the plan should make provision for a minimum of 18,450 dwellings in the plan period.

Notwithstanding that, BHL welcomes DBC's specific reference to the quantum, whilst now superseded, being a minimum value. Indeed, that reflects the NPPF's imperative that "*plans should, as a minimum, provide for objectively assessed needs for housing and other uses*" (paragraph 11) and "*be prepared positively, in a way that is aspirational but deliverable*" (paragraph 16b).

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11901

**Person ID** 1269313

**Full Name** Mrs Rachel Martinek

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

- 1 Overall: the Emerging Strategy is not fit for purpose:
  - It starts from an unsound target for housing numbers which is incorrectly presented as a fait accompli;
  - It is based on proposed use of Green Belt land, which is intended only as a last resort in exceptional circumstances and specifically when other options are exhausted, which DBC have not done;
  - In proposing development of Green Belt land, Dacorum Borough Council (DBC) incorrectly judge the balance of benefits vs harm by variously downplaying or ignoring harms, and / or proposing spurious and incomplete mitigation;
  - It proposes disproportionate, unjustified and poorly evidenced development in and around Tring;
  - Throughout, it appears that DBC is attempting to disguise essentially political decisions through technical argument; and in any case, the technical argument is variously absent; incomplete; and / or incorrect.

## Unsound target for housing numbers

- 1 **The Emerging Strategy uses an a priori unsound assessment of housing need.** 16,596 was generated using guidance based on the White Paper of August 2020. This was out for consultation at the time and has not yet been passed into law. The Emerging Strategy acknowledges this at 5: *“However, the Government is proposing changes to the standard method in its recent consultations on the Planning Reform White Paper and related changes to the planning system. We have therefore progressed the Plan on the basis of this new housing need calculation of 922 homes pa (i.e. 16,596 homes over the period 2020-38). We recognise 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.”* But **this is disingenuous: it is impossible to take a sound judgement on constraints against a starting figure that is in doubt, given that both aspects inform each other.**
  
- 1 **The Emerging Strategy incorrectly conflates "housing need" with "housing requirement" and presents it as a fait accompli.** 16,596 is an "unconstrained assessment of housing need" but not a "housing requirement figure" [gov.uk 2a-001-20190220]. There is no *obligation* to fulfil 16,596 (but many good reasons not to, if it requires Green Belt land):
  - Housing requirement figures should be established *against constraints* including policies under National Planning Policy Framework (NPPF) pa11 footnote 6 [gov.uk 3-002-20190722]
  - Footnote 6 policies include restrictions on Green Belt development unless under exceptional circumstances. NPPF para137 "exceptional circumstances" include when other options are exhausted: *“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.”*
  - Housing requirement figures show the extent to which need can be met once constraints are considered (NPPF para 65). There is no statutory obligation to meet standard method need, as long as the ground work has been done. There is no statutory obligation to release Green Belt land to meet need (especially if the harm done by releasing the land exceeds the benefit of the new housing);
  - (3-025-20190722) *“If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.”*

- 1 The existing (pre-White Paper) Standard Method for calculating housing need works on the ONS sub-national population projections. These are increased by an affordability adjustment that aims to counteract historic undersupply. This means that the figure produced by the Standard Method is already not only a reflection of actual population growth [i.e. it is an idealised figure, correcting for historic imbalance]. This underlines the importance of considering exceptional circumstances and constraints when looking at Green Belt land, in order to balance ideal housing delivery against the harm caused by overriding constraints.
  
- 1 **DBC fail to prove exceptional circumstances, through a failure to exhaust other options:**
  - No evidence that brownfield opportunities in Hemel Hempstead have been sufficiently explored. For example, there could potentially be redevelopment of unused retail and commercial (brownfield) sites;
  - DBC has failed to make proper robust assessment of brownfield sites within the boundaries for the existing settlements of Tring and Berkhamsted, which it is required to do by Government, before proposing release and development of Green Belt outside present urban perimeters.
  - There has been no evidenced position provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken so as to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites
  - Insufficient analysis of contributions from conversions & enhanced permitted development rights
  - No identification of cooperation with the adjoining Local Authorities of Hertfordshire, Buckinghamshire and Bedfordshire in order to explore whether housing need can be met there instead. The NPPF specifically stipulates a “duty to co-operate” between adjoining Local Authorities.
  
- 1 **DBC fail to show that they have taken sufficient account of constraints, which would in all likelihood reduce the number.** See below for extensive comments on specific options and site proposals in which DBC have not taken sufficient account of constraints.
  
- 1 **DBC have, without sufficient justification, also put themselves at odds with the direction and intent of national government policy.** By unnecessarily pressing ahead while the White Paper was out for consultation, DBC have - thus far – been unable to take account of national government policy set out in the Written Ministerial Statement of 16 Dec 2020, which follows public objections to the White Paper. The WMS refocuses policy on building in urban areas, supporting levelling up and regenerating brownfield sites, thereby protecting Green Belt land - unlike DBC’s approach of unnecessarily choosing to build on Green Belt land. In addition, the government's response to the White Paper consultation reiterates that "We should be clear that meeting housing need is never a reason to cause unacceptable harm to [protected land and Green Belt]".

- 1 **A lower housing requirement figure could have been justified and *not* required Green Belt land.** For example, 10,000 houses would represent 15% growth, which is above the ONS SNPP projection of 9%, and therefore would go some way to countering historic undersupply, but would not entail consideration of Green Belt land.
  
- 1 **DBC have therefore taken a political decision to retain the highest figure, prioritising that rather than prioritising environmental protections - but without making this explicit in order to allow residents to judge it on its own merits.**
  
- 1 **It is possible DBC have done this in order to fulfil an unexplicit vision for the borough which relies on an artificially high housing needs number.** This is signalled in the [Sustainability Appraisal Interim report p47](#):  
*“Significant growth is also planned for the market towns of Berkhamsted and Tring, which will enable the delivery of new infrastructure, including sustainable transport schemes, new primary and secondary schools, local/community centres, enhancements to health facilities and significant new open spaces. This growth is necessary to consolidate these towns’ respective roles as the most sustainable locations outside of Hemel Hempstead, ensuring that the necessary infrastructure is in place to support existing and future communities while maintaining the vitality and viability of the town centres.”* This suggests that DBC are targeting a high housing number, building on Green Belt land, *in order* to secure funding for new infrastructure. This is unacceptable for two reasons:
  - It is reverse logic. Infrastructure should follow housing need, not dictate it artificially;
  - If DBC wishes to propose growing Tring and Berkhamsted, it should make this an explicit proposal for consultation with residents of those towns and surrounding villages, not hide it as a by-product of an alleged need to meet an inflated target.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11910

**Person ID** 1269207

**Full Name** Millbank Land Millbank Land

**Organisation Details** Millbank Land Ltd

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Draft Dacorum Local Plan Regulation 18 consultation document seeks comments on the emerging vision, policies and evidence base in working towards adopting a sound Local Plan. This section provides justification for the allocation of land at Bulbourne Park for new development in the forthcoming Local Plan and responds to particular questions of relevance posed by the Council as part of the consultation questionnaire.

Under the Sustainable Development Strategy, draft Policy SP2 sets out that for the period 2020-2038 provision will be made for a minimum of 16,596 homes. The majority of this will be delivered at sites in and around Hemel Hempstead (10,600 homes), with Berkhamstead accommodating at least 2,200 homes and Tring providing for 2,700 new homes. Some smaller levels of growth are also proposed in the large villages of Bovingdon, Kings Langley and Markyate. Further detail on the strategy to deliver housing is included at draft Policy SP4.

Significantly, the housing need figure included in the draft Local Plan equates to 922 dwellings per annum (dpa), rather than 1,023dpa as required by the standard method for calculating housing need set out by the Government. This lower figure is derived from the Government's proposed revisions to the standard method announced in August 2020. However, since then, the Government has decided not to proceed with the proposed changes and rather revert back to the previous version of the standard method calculation for housing need, but with an uplift of 35% for the 20 largest cities and urban areas. Dacorum is not impacted by this uplift but should be seeking to meet the housing need figure of 1,023dpa. This would therefore require the LPA to identify land for at least 18,414 homes over the Plan period (an additional 1,818 dwellings). It is therefore imperative that draft Policy SP2 is amended to meet this higher housing need figure to ensure that the Plan is in accordance with NPPF paragraph 60. Consequently, the Council will also need to identify further sites for housing allocations to meet this increased need, as set out below.

**Unmet Need**

In addition to its own housing needs, as part of its Duty to Co-operate, Dacorum is required to assist in accommodating any unmet need in neighbouring areas where it is practical and consistent with achieving sustainable development. To this end, the draft Local Plan identifies at paragraph 1.32 that there are potential unmet needs in Watford. Watford is currently preparing a new Local Plan and the latest draft includes a supply of 714dpa against a standard method requirement of 787dpa (a shortfall of 73dpa, or 1,314 dwellings over the Plan period of 2018-2036). The other authorities in the South West Hertfordshire HMA (Three Rivers and Hertsmere) are at earlier stages of their Local Plan preparation and therefore it is not clear if unmet needs exist, however if they do Dacorum will be required to assist in meeting them.

Unmet needs in London are also widely acknowledged to be considerable and growing, with the soon- to-be adopted London Plan including an annual target of approximately 52,000dpa compared to a standard method requirement of 93,000dpa. This means there is a shortfall of approximately 41,000 dwellings every year that London is unable to deliver, whilst historical delivery rates also indicate that the lower housing target will not even be met. Therefore, areas such as

Dacorum within the wider south-east and which have strong migration and commuting links to London will face increasing pressure to meet these outstanding needs.

It is essential that Dacorum identify sufficient land to accommodate these unmet needs so that the Plan can be considered as positively prepared in accordance with paragraph 35 of the NPPF. Identifying these sites now through the local plan process rather than through planning applications and appeals will also ensure that sustainable development can be delivered in accordance with the Council's vision and spatial strategy.

### **Housing Supply**

As set out above, Dacorum should be seeking to identify land for at least 18,414 homes over the Plan period. However, it should be recognised that this is a minimum housing requirement, and the LPA should seek to identify land for more housing beyond this requirement, particularly when it is likely that there will be unmet need from neighbouring authorities. Not only will this ensure choice and flexibility in the supply should some sites not come forward as anticipated, but it will accord with the Government's objective to significantly boost the supply of housing as set out in paragraph 59 of the NPPF.

Significantly, with the current proposed housing requirement and supply set out in the Plan, if even a small proportion of the allocated sites do not come forward as anticipated, there will be a shortfall in supply. As set out in Table 2 of the draft Local Plan, the identified supply includes land to deliver only 303 additional houses above the 16,596 dwelling requirement (c.2% uplift). However, it is considered that at a minimum a 10% buffer should be applied to the requirement, although any increase on this would ensure greater flexibility to meet housing needs. Dacorum should therefore be identifying land for 20,255 dwellings over the Plan period.

In addition, the Council will be unable to demonstrate a five-year supply of housing upon adoption of the Local Plan as the draft Plan includes a five-year housing land supply of just 5.1 years. Meanwhile, the housing trajectory included at Figure 2 includes a number of years of the Plan period (particularly at the beginning and end) where the lower target of 922 dwellings will not even be met. It is therefore key that additional housing sites are identified in the emerging Local Plan to be able to demonstrate a five-year housing land supply and that the requirement can be met over the Plan period as required by the NPPF. In particular, smaller sites are supported in the NPPF as they can *"make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly"* (paragraph 68). They can also contribute to providing affordable housing in the short- to medium-term and addressing market housing affordability.

In terms of identifying sites, the spatial strategy is focused too heavily on delivery of housing in Hemel Hempstead. More specifically, 63% of the total identified housing supply is proposed here, the majority of which comprises new Garden Communities and urban extensions. Whilst it is acknowledged that a proportion of housing should be delivered in the

most sustainable settlement in the borough, relying on such a large proportion here (10,600 dwellings as set out in draft Policy SP2) does not provide enough flexibility in the supply, should there be any issues with these sites coming forward. Similarly for Tring, 81% of the 2,700 homes proposed from Tring are expected to come forward from large-scale strategic allocations.

Large scale developments often have long lead-in times linked to the preparation of a Supplementary Planning Document that will need to be in place before any approvals are granted. The submission and determination of planning applications would need to follow this and given the scale and complexity of the schemes and the associated legal agreements. This could be expected to take a considerable time. Reserved matters applications would also need to be progressed, and pre-commencement conditions discharged before a start on-site would be achieved. Furthermore, infrastructure delivery will be pivotal in determining timescales. As such it is considered unlikely that sites such as that at North of Hemel Hempstead Growth Areas (HH01) could begin delivering homes in 2028/29. Furthermore at Tring, the allocations of New Mill and East of Tring are required to be planned together as part of a comprehensive development and this will inevitably give rise to delays compared to if they were delivered separately whereby one site cannot come forward without the other. However these sites are anticipated to come forward from 2025/26 and 2027/28 respectively.

A greater range of sites of varying sizes and location should therefore be allocated within the draft Local Plan to ensure that Dacorum can meet its housing needs across the whole Plan period. Without this flexibility, there will be too much reliance on these larger sites that are more likely to be delayed by issues before any houses can be delivered on site, such as preparation and consultation on masterplans and design codes, provision of infrastructure and viability.

Small sized sites which can be brought forward in the early part of the plan period should be identified to contribute to providing housing need including affordable housing, addressing issues with the housing trajectory and providing additional flexibility.

In order to address this shortcoming, it is essential that additional sites are allocated within the Plan to bolster the supply in the early part of the plan period and ensure that a five-year land supply both exists on adoption, and can be maintained.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11922
<b>Person ID</b>	1269346
<b>Full Name</b>	JED GRIFFITHS
<b>Organisation Details</b>	KINGS LANGLEY & DISTRICT RESIDENTS' ASSOCIATION

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>1 In paragraph 1.30 of the Growth Strategy, there is a clear acknowledgement of the legal “duty to cooperate” introduced by the Localism Act 2011 and confirmed in its Statement of Compliance Document. This places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis with their neighbouring authorities and other bodies about cross boundary issues. KL&amp;DRA welcomes the work that the Borough Council has done so far with neighbouring authorities, and the initiative to prepare a South West Hertfordshire Joint Strategic Plan. Completion of the document, however, and thus compliance with the legal requirement to meet and fulfil the duty to cooperate is not expected for about two years and it is unlikely that it will be fully adopted by all five authorities by the end of 2023. With this in mind, KL&amp;DRA considers that the timetable for the submission of the Dacorum Local Plan, as described in paragraph 1.24 and Figure 1 of the Growth Strategy, is premature and needs to be revised. In KL&amp;DRA’s view, in order to meet and fulfil the Duty to Cooperate, it is essential that the preparation of the two documents is run in parallel, to be presented for public examination simultaneously</p> <p>1 Engagement with other authorities has taken place on strategic matters in South West Hertfordshire (as stated in paragraph 1.32). One of the key issues listed is the potential unmet housing needs of Watford. At the more local level, however, KL&amp;DRA is concerned that there has been insufficient consideration of the role and function of Kings Langley, which remains a vibrant compact village, delivering a high quality of life for local residents and businesses, whose natural, historic and built heritage has been conserved, particularly in the context of its setting in the wider sub This needs to be addressed.</p> <p>1 Both the Borough and Parish boundaries are tightly drawn – to the east by the Grand Union Canal and to the south by the M25. This is clearly acknowledged in paragraph 23.167 of the Growth Despite this, and the statement that the Borough Council works closely with Three Rivers District Council to ensure a “consistent settlement-wide approach”, it is concluded that “we can only plan for the Dacorum part of the village.”</p> <p>1 The above statement is disappointing and suggests that the Growth Strategy does neither appreciate nor acknowledge fully the cross-boundary potential for development. A request should be made to Three Rivers District and St Albans Councils through the Duty to Cooperate, for any residential development to contribute towards the overall housing and employment needs of Dacorum Borough Council. In paragraph 23.176, it is stated that “<i>While there are reasonable levels of employment in the village, most of this is located in Three Rivers, which this Council</i></p>

*has no planning control over.”* Although the strategy includes proposing a site (KL03) for employment uses at Sunderland’s Yard, Church Lane, there is no specific reference to potential sites for employment and housing which are in Three Rivers but adjacent to the village.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11923

**Person ID** 1269346

**Full Name** JED GRIFFITHS

**Organisation Details** KINGS LANGLEY & DISTRICT RESIDENTS' ASSOCIATION

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

1 KL&DRA is aware that Three Rivers District Council is preparing a draft Local Plan, which will be published under Regulation 18 for consultation in May-July 2021. Undoubtedly, this will highlight the acute pressures in Three Rivers with regards to housing supply and the threat to the Green As with the other local authorities in South West Hertfordshire, the District Council will be seeking to maximise the areas of brown field land for housing development. In that respect, KL&DRA draws attention to the fact that an area of 30 hectares to the east of the Grand Union Canal is referred to by Three Rivers District Council as the Kings Langley Employment Area (KLEA). This represents over 60% of that Council’s Brown Field Register, and it is clear that the authority has a policy of converting employment sites in the KLEA to housing. More generally, KL&DRA would also refer to several specific employment sites which have recently been lost in Three Rivers. These include Astra Zeneca, West Herts College, Stannah

House, and Primrose Hill (two sites). Conversion of many of these sites for housing, particularly in the KLEA, would increase pressures on infrastructure and services, much of which would be felt in the Kings Langley area.

- 1 To illustrate the above point, KL&DRA has prepared a map, which is attached to this statement as Appendix 1 - this shows the relationship between the village and the respective local authority areas. The map shows in green the sites which were included by Dacorum Borough Council for the Issues and Options consultation in 2017. In orange are depicted the areas within Three Rivers which have been put forward by landowners and developers for consideration under the recent "Call for Sites" exercise. The map clearly shows the potential for large scale development to the east of Kings Langley.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS11950

**Person ID** 1269350

**Full Name** Jan Dent Safer Gravel Path Action Group

**Organisation Details** SECRETARY  
Safer Gravel Path Action Group

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Housing numbers**

- The Council is using outdated (2014) housing projections. Half of this number (or fewer) are needed in reality. The whole Local Plan should be based on the more up to date ONS data from 2018. DBC must challenge the proposed housing numbers rather than just accept them. This is a fundamental error and will render any planning actions based on this flawed plan highly vulnerable to judicial review.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11955
<b>Person ID</b>	1269350
<b>Full Name</b>	Jan Dent Safer Gravel Path Action Group
<b>Organisation Details</b>	SECRETARY Safer Gravel Path Action Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11968
<b>Person ID</b>	1264526
<b>Full Name</b>	Peter King
<b>Organisation Details</b>	Water End & Upper Gade Valley Conservation Society
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>• <b>Strategy for Growth</b></li> </ul> <p>There is no real sustainable development strategy, just the building of large quantities of housing on green belt land and which is predominantly agricultural. The Plan plays lip service to sustainability.</p> <ul style="list-style-type: none"> <li>• <b>Infrastructure</b></li> </ul> <p>The proposed link road from Junction 8 of the M1 to the B440 Leighton Buzzard Rd is supposed to facilitate access from Berkhamsted and Tring to the M1. To get to the B440 traffic from Berkhamsted and Tring will have to travel along country lanes. It is totally ill thought out. It is clear the planners have no concept of the current road system in the rural areas. The Plan refers to the B440 as the A4146 indicating it is a main arterial road. Again a misconception or mistake by the planners.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11974
<b>Person ID</b>	1269352
<b>Full Name</b>	Walid Youssef
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS11985
<b>Person ID</b>	333667

<b>Full Name</b>	Mrs Patricia Simons
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The Chilterns is an Area of outstanding Beauty and the Green Belt Land within it should only be released in exceptional circumstances. Government numbers are targets which must be justified. I disagree with this Draft Plan because housing numbers should reflect need and not want in an overcrowded South East of England.</p> <p>Green Spaces are of enormous importance to the wellbeing of inhabitants and serious considerations should be made for their loss.</p> <p>The relocation of sports fields in an area of rolling topography is not to be underestimated. It is straight forward to build houses on established, flat playing fields, but expensive and challenging to create flat, well drained, grass playing fields and inhibit dangerous flint stones from rising to the surface on valley sides.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12004
<b>Person ID</b>	1269353
<b>Full Name</b>	TESSA BARFIELD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.

Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12008

**Person ID** 1161359

**Full Name** D B Land and Planning

**Organisation Details** D B Land and Planning

**Agent ID** 1161362

**Agent Name** Nathan  
McLoughlin

**Agent Organisation** McLoughlin Planning

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

**Spatial Strategy for Growth comment**

Paragraphs 5.1 to 5.8  
DBLP broadly supports the Spatial Strategy. However, in terms of the key principles behind the strategy set out in paragraph 5.2, concern is expressed about the “minimising and managing” the requirement to release Green Belt land. Given the need in the Standard Method to accommodate 1,023 dwellings per annum, it is simply unavoidable that the Plan will not release Green Belt land for development. Whilst the political sentiments of minimising such release are understood, the Plan is designed to direct development in the Borough throughout the lifetime of the Plan. Given the magnitude of development required and the need for releasing such land, references to ‘minimising and managing’ the release of Green Belt land is unhelpful. Furthermore, it conflicts with paragraph 5.3 which recognises the aim of the Spatial Strategy to deliver a “significant uplifting growth”.

In paragraph 5.6, DBLP support the role of Large Villages and equally support the recognition that Markyate is a Large Village that provides a reasonable level of services and facilities. In Development Strategy terms, this would make it a suitable location for additional housing growth and meet the requirements of paragraph 78 of the NPPF.

Policy SP2 – Spatial Strategy for Growth

There is a concern that the Plan’s housing target set at a minimum of 16,596 homes over an 18-year Plan period is not meeting the requirements of the revised Standard Method. This then raises the inevitable question of whether the Plan is sound or not. Whilst DBLP’s land at Markyate is allocated for housing development to help deliver the Spatial Strategy (as recognised in Part 3 of the policy), there is still the basic need to ensure that the policy is compliant with national guidance regarding housing provision. Alternatively, the policy needs to justify why the Standard Method figure is not used as per the “Housing and economic needs” Section of the NPPG.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12010

**Person ID** 1171333

**Full Name** Millbank Land

**Organisation Details** Millbank Land

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Draft Dacorum Local Plan Regulation 18 consultation document seeks comments on the emerging vision, policies and evidence base in working towards adopting a sound Local Plan. This section provides justification for the allocation of land at Bulbourne Park for new development in the forthcoming Local Plan and responds to particular questions of relevance posed by the Council as part of the consultation questionnaire.

Under the Sustainable Development Strategy, draft Policy SP2 sets out that for the period 2020-2038 provision will be made for a minimum of 16,596 homes. The majority of this will be delivered at sites in and around Hemel Hempstead (10,600 homes), with Berkhamstead accommodating at least 2,200 homes and Tring providing for 2,700 new homes. Some smaller levels of growth are also proposed in the large villages of Bovington, Kings Langley and Markyate. Further detail on the strategy to deliver housing is included at draft Policy SP4.

Significantly, the housing need figure included in the draft Local Plan equates to 922 dwellings per annum (dpa), rather than 1,023dpa as required by the standard method for calculating housing need set out by the Government. This lower figure is derived from the Government’s proposed revisions to the standard method announced in August 2020. However, since then, the Government has decided not to proceed with the proposed changes and rather revert back to the previous

version of the standard method calculation for housing need, but with an uplift of 35% for the 20 largest cities and urban areas. Dacorum is not impacted by this uplift but should be seeking to meet the housing need figure of 1,023dpa. This would therefore require the LPA to identify land for at least 18,414 homes over the Plan period (an additional 1,818 dwellings). It is therefore imperative that draft Policy SP2 is amended to meet this higher housing need figure to ensure that the Plan is in accordance with NPPF paragraph 60. Consequently, the Council will also need to identify further sites for housing allocations to meet this increased need, as set out below.

### **Unmet Need**

In addition to its own housing needs, as part of its Duty to Co-operate, Dacorum is required to assist in accommodating any unmet need in neighbouring areas where it is practical and consistent with achieving sustainable development. To this end, the draft Local Plan identifies at paragraph 1.32 that there are potential unmet needs in Watford. Watford is currently preparing a new Local Plan and the latest draft includes a supply of 714dpa against a standard method requirement of 787dpa (a shortfall of 73dpa, or 1,314 dwellings over the Plan period of 2018-2036). The other authorities in the South West Hertfordshire HMA (Three Rivers and Hertsmere) are at earlier stages of their Local Plan preparation and therefore it is not clear if unmet needs exist, however if they do Dacorum will be required to assist in meeting them.

Unmet needs in London are also widely acknowledged to be considerable and growing, with the soon- to-be adopted London Plan including an annual target of approximately 52,000dpa compared to a standard method requirement of 93,000dpa. This means there is a shortfall of approximately 41,000 dwellings every year that London is unable to deliver, whilst historical delivery rates also indicate that the lower housing target will not even be met. Therefore, areas such as Dacorum within the wider south-east and which have strong migration and commuting links to London will face increasing pressure to meet these outstanding needs.

It is essential that Dacorum identify sufficient land to accommodate these unmet needs so that the Plan can be considered as positively prepared in accordance with paragraph 35 of the NPPF. Identifying these sites now through the local plan process rather than through planning applications and appeals will also ensure that sustainable development can be delivered in accordance with the Council's vision and spatial strategy.

### **Housing Supply**

As set out above, Dacorum should be seeking to identify land for at least 18,414 homes over the Plan period. However, it should be recognised that this is a minimum housing requirement, and the LPA should seek to identify land for more housing beyond this requirement, particularly when it is likely that there will be unmet need from neighbouring authorities. Not only will this ensure choice and flexibility in the supply should some sites not come forward as anticipated, but it will accord with the Government's objective to significantly boost the supply of housing as set out in paragraph 59 of the NPPF.

Significantly, with the current proposed housing requirement and supply set out in the Plan, if even a small proportion of the allocated sites do not come forward as anticipated, there will be a shortfall in supply. As set out in Table 2 of the draft Local Plan, the identified supply includes land to deliver only 303 additional houses above the 16,596 dwelling requirement (c.2% uplift). However, it is considered that at a minimum a 10% buffer should be applied to the requirement, although any increase on this would ensure greater flexibility to meet housing needs. Dacorum should therefore be identifying land for 20,255 dwellings over the Plan period.

In addition, the Council will be unable to demonstrate a five-year supply of housing upon adoption of the Local Plan as the draft Plan includes a five-year housing land supply of just 5.1 years. Meanwhile, the housing trajectory included at Figure 2 includes a number of years of the Plan period (particularly at the beginning and end) where the lower target of 922 dwellings will not even be met. It is therefore key that additional housing sites are identified in the emerging Local Plan to be able to demonstrate a five-year housing land supply and that the requirement can be met over the Plan period as required by the NPPF. In particular, smaller sites are supported in the NPPF as they can *“make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”* (paragraph 68). They can also contribute to providing affordable housing in the short- to medium-term and addressing market housing affordability.

In terms of identifying sites, the spatial strategy is focused too heavily on delivery of housing in Hemel Hempstead. More specifically, 63% of the total identified housing supply is proposed here, the majority of which comprises new Garden Communities and urban extensions. Whilst it is acknowledged that a proportion of housing should be delivered in the most sustainable settlement in the borough, relying on such a large proportion here (10,600 dwellings as set out in draft Policy SP2) does not provide enough flexibility in the supply, should there be any issues with these sites coming forward. Similarly for Tring, 81% of the 2,700 homes proposed from Tring are expected to come forward from large-scale strategic allocations.

Large scale developments often have long lead-in times linked to the preparation of a Supplementary Planning Document that will need to be in place before any approvals are granted. The submission and determination of planning applications would need to follow this and given the scale and complexity of the schemes and the associated legal agreements. This could be expected to take a considerable time. Reserved matters applications would also need to be progressed, and pre- commencement conditions discharged before a start on-site would be achieved. Furthermore, infrastructure delivery will be pivotal in determining timescales. As such it is considered unlikely that sites such as that at North of Hemel Hempstead Growth Areas (HH01) could begin delivering homes in 2028/29. Furthermore at Tring, the allocations of New Mill and East of Tring are required to be planned together as part of a comprehensive development and this will inevitably give rise to delays compared to if they were delivered separately whereby one site cannot come forward without the other. However these sites are anticipated to come forward from 2025/26 and 2027/28 respectively.

A greater range of sites of varying sizes and location should therefore be allocated within the draft Local Plan to ensure that Dacorum can meet its housing needs across the whole Plan period. Without this flexibility, there will be too much reliance on these larger sites that are more likely to be delayed by issues before any houses can be delivered on site, such as preparation and consultation on masterplans and design codes, provision of infrastructure and viability.

Small sized sites which can be brought forward in the early part of the plan period should be identified to contribute to providing housing need including affordable housing, addressing issues with the housing trajectory and providing additional flexibility.

In order to address this shortcoming, it is essential that additional sites are allocated within the Plan to bolster the supply in the early part of the plan period and ensure that a five-year land supply both exists on adoption, and can be maintained.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12047

**Person ID** 330363

**Full Name** Mr. Graham Lay

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The local infrastructure cannot sustain this rapid and extensive development. It appears the government is planning on the increased revenue from the development of housing and businesses to fund infrastructure growth. That has been seen to cause problems in the past and lessons should have been learned by now. The schools, transport, water supply, water treatment, roads, and emergency services are all strained at the moment so planning to increase housing and businesses to the extent detailed, before any basic infrastructure is even started, is a shameful waste of opportunity and money on this study.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS12074
<b>Person ID</b>	1269372
<b>Full Name</b>	MATTHEW SPEED
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p> <p>intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set</p>

out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12087
<b>Person ID</b>	1269386
<b>Full Name</b>	KERR LINDA
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	Environment  The inevitable increase in car traffic will overburden the inadequate road system, creating bottle necks and increase the air pollution.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12096
<b>Person ID</b>	1145913
<b>Full Name</b>	Miss Vicky Duxbury
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	endorse the comments of the CCG & the other organisations within the 'One Voice' Alliance which oppose the DBC Local Plan 2020-38 on the following grounds:-  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 homes.  2 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** Spatial Strategy for Growth

**ID** EGS12100

**Person ID** 1145854

**Full Name** Mrs Deborah Doughty

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12145
<b>Person ID</b>	1160677
<b>Full Name</b>	Mr Paul Doughty
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p>

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12164

**Person ID** 1269444

**Full Name** Mr & Ms Jim & Katie Barnard & Partridge

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Do you have any specific comments about any of the delivery strategies?

—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is

really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and we cannot support this.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12175

**Person ID** 1269448

**Full Name** Mr John Mardell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment** There's no indication of the effect on existing dwellings and occupiers of additional houses. The share of increases being mainly in Hemel Hempstead seems unfair

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12196

**Person ID** 1145481

**Full Name** Mr Brian Kazer

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	<p>Policy SP2</p> <p>“At least 2,700” houses in Tring is simply not sustainable, because it represents a huge 55% increase in the size of Tring. Additionally the sustainability assessment appears to have overlooked the cumulative impact of such huge growth, instead seemingly considering Tr01, Tr02 and Tr03 separately. The sustainability aspect of the big growth in car numbers, and their impact, appears to be overlooked given that in Tring around 5,000 extra cars are likely (based on current number of cars per household)</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12208
<b>Person ID</b>	1269470
<b>Full Name</b>	PHILIP MOORE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>1 <b>Overall: the Emerging Strategy is <u>not fit for purpose</u>:</b></p> <ul style="list-style-type: none"> <li>• It starts from an unsound target for housing numbers which is incorrectly presented as a fait accompli;</li> <li>• It is based on proposed use of Green Belt land, which is intended only as a last resort in exceptional circumstances and specifically when other options are exhausted, which DBC have not done;</li> <li>• In proposing development of Green Belt land, Dacorum Borough Council (DBC) incorrectly judge the balance of benefits vs harm by variously downplaying or ignoring harms, and / or proposing spurious and incomplete mitigation;</li> <li>• It proposes disproportionate, unjustified and poorly evidenced development in and around Tring;</li> <li>• Throughout, it appears that DBC is attempting to disguise essentially political decisions through technical argument; and in any case, the technical argument is variously absent; incomplete; and / or incorrect.</li> </ul> <p><b><u>Unsound target for housing numbers</u></b></p> <p>1 <b>The Emerging Strategy uses an a priori unsound assessment of housing need.</b> 16,596 was generated using guidance based on the White Paper of August 2020. This was out for consultation at the time and has <u>not</u> yet been passed into law. The Emerging Strategy acknowledges this at 5: <i>“However, the Government is proposing changes</i></p>

to the standard method in its recent consultations on the Planning Reform White Paper and related changes to the planning system. We have therefore progressed the Plan on the basis of this new housing need calculation of 922 homes pa (i.e. 16,596 homes over the period 2020-38). We recognise 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.” But **this is disingenuous: it is impossible to take a sound judgement on constraints against a starting figure that is in doubt, given that both aspects inform each other.**

- 1 **The Emerging Strategy incorrectly conflates "housing need" with "housing requirement" and presents it as a fait accompli.** 16,596 is an "unconstrained assessment of housing need" but not a "housing requirement figure" [gov.uk 2a-001-20190220]. There is no *obligation* to fulfil 16,596 (but many good reasons not to, if it requires Green Belt land):
  - Housing requirement figures should be established *against constraints* including policies under National Planning Policy Framework (NPPF) pa11 footnote 6 [gov.uk 3-002-20190722]
  - Footnote 6 policies include restrictions on Green Belt development unless under exceptional circumstances. NPPF para137 "exceptional circumstances" include when other options are exhausted: “*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.*”
  - Housing requirement figures show the extent to which need can be met once constraints are considered (NPPF para 65). There is no statutory obligation to meet standard method need, as long as the ground work has been done. There is no statutory obligation to release Green Belt land to meet need (especially if the harm done by releasing the land exceeds the benefit of the new housing);
  - (3-025-20190722) “*If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.*”
  
- 1 The existing (pre-White Paper) Standard Method for calculating housing need works on the ONS sub-national population projections. These are increased by an affordability adjustment that aims to counteract historic undersupply. This means that the figure produced by the Standard Method is already not only a reflection of actual population growth [i.e. it is an idealised figure, correcting for historic imbalance]. This underlines the importance of

considering exceptional circumstances and constraints when looking at Green Belt land, in order to balance ideal housing delivery against the harm caused by overriding constraints.

**1 DBC fail to prove exceptional circumstances, through a failure to exhaust other options:**

- No evidence that brownfield opportunities in Hemel Hempstead have been sufficiently explored. For example, there could potentially be redevelopment of unused retail and commercial (brownfield) sites;
- DBC has failed to make proper robust assessment of brownfield sites within the boundaries for the existing settlements of Tring and Berkhamsted, which it is required to do by Government, before proposing release and development of Green Belt outside present urban perimeters.
- There has been no evidenced position provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken so as to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites
- Insufficient analysis of contributions from conversions & enhanced permitted development rights
- No identification of cooperation with the adjoining Local Authorities of Hertfordshire, Buckinghamshire and Bedfordshire in order to explore whether housing need can be met there instead. The NPPF specifically stipulates a “duty to co-operate” between adjoining Local Authorities.

**1 DBC fail to show that they have taken sufficient account of constraints, which would in all likelihood reduce the number.** See below for extensive comments on specific options and site proposals in which DBC have not taken sufficient account of constraints.

**1 DBC have, without sufficient justification, also put themselves at odds with the direction and intent of national government policy.** By unnecessarily pressing ahead while the White Paper was out for consultation, DBC have - thus far – been unable to take account of national government policy set out in the Written Ministerial Statement of 16 Dec 2020, which follows public objections to the White Paper. The WMS refocuses policy on building in urban areas, supporting levelling up and regenerating brownfield sites, thereby protecting Green Belt land - unlike DBC’s approach of unnecessarily choosing to build on Green Belt land. In addition, the government’s response to the White Paper consultation reiterates that “We should be clear that meeting housing need is never a reason to cause unacceptable harm to [protected land and Green Belt]”.

**1 A lower housing requirement figure could have been justified and *not* required Green Belt land.** For example, 10,000 houses would represent 15% growth, which is above the ONS SNPP projection of 9%, and therefore would go some way to countering historic undersupply, but would not entail consideration of Green Belt land.

1 DBC have therefore taken a political decision to retain the highest figure, prioritising that rather than prioritising environmental protections - but without making this explicit in order to allow residents to judge it on its own merits.

1 It is possible DBC have done this in order to fulfil an unexplicit vision for the borough which relies on an artificially high housing needs number. This is signalled in the [Sustainability Appraisal Interim report p47](#):  
*“Significant growth is also planned for the market towns of Berkhamsted and Tring, which will enable the delivery of new infrastructure, including sustainable transport schemes, new primary and secondary schools, local/community centres, enhancements to health facilities and significant new open spaces. This growth is necessary to consolidate these towns’ respective roles as the most sustainable locations outside of Hemel Hempstead, ensuring that the necessary infrastructure is in place to support existing and future communities while maintaining the vitality and viability of the town centres.”* This suggests that DBC are targeting a high housing number, building on Green Belt land, in order to secure funding for new infrastructure. This is unacceptable for two reasons:

- It is reverse logic. Infrastructure should follow housing need, not dictate it artificially;

If DBC wishes to propose growing Tring and Berkhamsted, it should make this an explicit proposal for consultation with residents of those towns and surrounding villages, not hide it as a by-product of an alleged need to meet an inflated target.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12218

**Person ID** 1249858

**Full Name** Mrs Jillian Luff

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

MAIN OBJECTION

- My primary objection is to the number of proposed new houses in DBC particularly to those on irreplaceable precious Green Belt. Once lost green spaces are gone forever.

- I do not believe your statement that ‘We have large number of houses we need to build in next 18 years’. This is being forced on a semi-rural area by Central Government.
- It is unacceptable and is a knock-on from London’s overpopulation and housing problems. The number must be reduced with concentration on brownfield sites.
- The deceptively attractive colour brochure sent to many residents failed to indicate just how many houses are proposed!
- Climate Emergency: Many of the council’s high ambitions to minimise increase in global warming in our locality will go out the window if this number of houses is built.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12240

**Person ID** 1269479

**Full Name** BARBARA HARVEY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of

further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

The scale of development right across Dacorum is quite clearly excessive and disproportionate. There is a housing need; everyone recognises that but increasing the size of a small market town like Tring by 50% cannot possibly be the answer.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12251
<b>Person ID</b>	1207796
<b>Full Name</b>	Ross Gemmell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The destruction of the Green belt and use of greenfield sites is not sustainable.</p> <p>Higher density, higher rise buildings using new materials remain unattractive in the wake of prior scandals. Higher rise accommodation has an unsuccessful track record in the UK and would blight the local landscape.</p> <p>Given the governments "levelling up" agenda and a post covid shift to remote working, it is not clear that excessive expansion at the volume proposed in Dacorum is needed or indeed likely to be commercially viable.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12280
<b>Person ID</b>	1269484
<b>Full Name</b>	SUSAN GILL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I think the number of homes planned is too many especially as there is a prodominant bias for using Green Belt Land. Communities are being over run and swamped with new housing without major improvements in the existing infrastucture to cope with the new residents or thought to old historical settlements. The total number of houses year on year is too high and does not address local housing needs for housing suitable for retired, both couples and single, single care leavers, those with Learning disabilities who need support, to mention just a few. I also think that any housing built should be as sustainable as possible, include solar, rain water harvesting and economic heating systems.</p> <p>While encouraging sustainable travel is a must, it should also be recognised that for many public transport will not work for many reasons. Any new developments need to have realistic parking so that it does not cause chaos both in the development and the surrounding area. Major modes of long range transport like the railway should have adequate parking and safe cycle storage. Tricks like providing a cycle park as pary of a development that is then scavenged back into the development as a dwelling once complete should not be granted, Cycle paths need to be fit for purpose and traffic slowed on our urban roads to 20mph to allow safe cying and walking.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12300
<b>Person ID</b>	1269488
<b>Full Name</b>	SAMANTHA SMITH
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	The development is not sustainable building on Greenbelt Land and should only be done in “exceptional circumstances”.
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12309
<b>Person ID</b>	1269489
<b>Full Name</b>	STEVE HILL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12316
<b>Person ID</b>	1264637
<b>Full Name</b>	Ollie Parrish
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12356

**Person ID** 1269491

**Full Name** Mr David Eeley

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12364
<b>Person ID</b>	1269492
<b>Full Name</b>	Mrs Isabelle Gorton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p>

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12376

**Person ID** 1269494

**Full Name** PATRICK FISHER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I am writing as a local resident to express my severe concerns regarding Dacorum Borough Council's proposed local plan.

Whilst I recognise that Dacorum may be compelled to contribute its share towards the government's house building target of 300,000 dwellings per annum, the published plan foresees a scale of development across the principal towns that will dramatically change them and their surroundings and involves a wide-ranging re-designation of Green Belt land for development.

- I believe it is entirely inappropriate to proceed with a consultation on a new local development plan for Dacorum at a time when:
    - We are in the midst of a debilitating COVID-19 pandemic:
      - Making a proper and open public consultation impossible and leaving the vast majority of residents entirely uninformed, not to mention disenfranchised
      - And which will doubtless have a profound impact on local businesses, employment and the housing market for some years to come
    - The government has changed national policies for assessing housing need, meaning that the basis of the proposed plan is fundamentally flawed
  - The plan places insufficient emphasis on brownfield development, but crucially also involves the irreversible loss of huge tracts of Green Belt land, particularly around Tring and Berkhamsted, and seriously imperils the setting of the Chilterns AONB
    - Whilst threatening to overwhelm Tring and Berkhamsted, putting great strain on our communities and their already overloaded infrastructure (viz. water supplies, congested roads and oversubscribed schools)
  - The proposed level of development (1023 dpa) is nearly three times the 2018 ONS projection of housing need (355 dpa) - and still double the number arrived at based on the government's "standard method" (497 dpa)
    - Moreover, none of the statistics that have been considered to date take any account of the impact of the COVID-19 pandemic
  - It should also be emphasised that so-called "windfall" developments have made a substantial contribution towards the annual increase in dwellings in Dacorum in recent years (average 306 dpa over last 14 years)
    - The impact of the COVID pandemic on businesses in town centres could well lead to a further increase in these windfall numbers over the coming years, as properties are repurposed from retail/office space to residential usage
- 
- On no account should we be countenancing such a wholesale sacrifice of local Green Belt land, particularly in these most uncertain of times
    - Brownfield sites should be prioritised for development, and these could be supplemented with smaller releases of land agreed in close consultation with local residents

- I urge DBC to redraw the plan based on achieved housing densities and to set its housing targets based on the most up-to-date projections of housing need - at the same time also reinforcing its commitment to delivering much needed affordable housing.
  - And put this out to proper consultation to all local residents in the next 12-18 months
- It would be prudent to factor in a facility to review the plan after say 5 years
  - By which time we should have an altogether better steer as to the extent that town centre properties are being repurposed as we emerge from the COVID-19 pandemic and local businesses and commuters have established enduring and sustainable“new normal” working practices.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12391

**Person ID** 1164091

**Full Name** R.J. Hollis

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Do you have specific comments about any of the Delivery Strategies?

They are too vague.

Without mentioning it, the plan will rely heavily on developers. They are notoriously devious in exploiting situations for profit rather than the common good. The plan delivery strategy needs to explain how the authority will control this aspect.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12399

<b>Person ID</b>	1269497
<b>Full Name</b>	MICHAEL RUDIN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.</p> <p>Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement for a plan, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered.</p>

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12429

**Person ID** 1146040

**Full Name** Mrs Rachel Macdonald

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Spatial Strategy for Growth**

The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1.

The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS12449
<b>Person ID</b>	1269507
<b>Full Name</b>	Andrew Calderwood
<b>Organisation Details</b>	Chair The Upper Gade Flyfishers and Conservation Association
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Chalk streams are a globally rare habitat and in this country are protected by the Water Framework Directive.</p> <p>The River Gade is one of three chalk streams that flow through the Borough. It rises from the aquifer close to Hudnall approximately 6 miles north of Hemel Hempstead. The Upper Gade Flyfishers and Conservation Association (UGFCA) maintains stretches of the Gade downstream of Great Gaddesden. We observe on an almost daily basis the effect on the riverine habitat of the varying flows in the river and in particular the stagnation and weed growth when, as has too frequently been the case over the past decade or more, the springs feeding the river have ceased to flow.</p> <p>All potable water consumed in the Borough is supplied by abstraction from the aquifers, (the River Colne catchment area) and there are no out of area supplies. The aquifers are fully charged at this time after wet winters in 2019/20 and 2020/21 but they are continually at risk from variable weather patterns and extraction such that in the past the Borough's chalk streams have dried up. In 2017 the River Bulborne dried up, flow in the Gade was very low and the Tring reservoirs were at their lowest levels that could be recalled. In 2019 flow was at its minimum and the Ballingdon Farm measuring borehole (for the Mid Chilterns Chalk aquifer and close to where the Gade historically rises) recorded its lowest August groundwater level since records began in 1975.</p> <p>The draft Plan sets out a number of policies on biodiversity and environmental protection, combating climate change and attaining carbon neutrality, which we support, but the essence of the Plan is the target to build 16,889 new homes and provide 20 hectares for employment growth over the Plan period. This growth rate at 922 new homes per annum (dpa) is more than double the rate set under the existing Plan, the 2013 Core Strategy, (430dpa) and will increase the Borough's population by at least 25%.</p> <p>The draft Plan is silent on how this growth in homes, population and employment is to be supplied with water. Policy DM33 states "avoid the need to abstract water from the ground, in particular the Rivers Ver, Gade and Bulborne catchments", but in the main is concerned with pollution and offers no supply solutions. The water supply company Affinity have had to agree a reduction in abstraction with the Environment Agency. They have a long term plan which requires major investment in building new water storage capacity and moving water from other areas of the country,</p>

however the benefits will not be available until the 2030's. In their 2019 Water Resources Plan they commit to continue making changes to improve the chalk streams but how they can achieve this without infrastructure to supply more water whilst reducing abstraction is not explained

CPRE Herts have submitted detailed analysis of the water supply and waste water disposal position which we acknowledge and fully endorse. They point out that chalk rivers are classified as priority habitats under Section 41 of the Natural Environment and Rural Communities Act 2006. The National Planning Policy Framework affords protection for priority habitats under paragraphs 174 and 175.

The UGFCA recognises there is a housing need in the Borough and that a long term Plan is required but, while we are not joining the discussion on the right method of calculating the Borough's housing need, it is clear that the draft Plan targets cannot be delivered without major infrastructure investment. This must be in place before the growth takes place or significant damage to natural habitats and the environment will result. This will be against the Borough's own policies, those of Central Government and indeed the law. In the circumstances we oppose the Plan's growth targets which must curtailed at least until the essential infrastructure is in place and protection of the environment and our precious natural habitats is guaranteed.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12453

**Person ID** 1145994

**Full Name** Penny Mould

**Organisation Details** Spatial Planner- Beds, Bucks and Herts  
Highways England

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Local Plan's spatial strategy aims to deliver the significant uplift in growth in a sustainable way across the Borough, seeking out opportunities to regenerate Hemel Hempstead. Elsewhere, DBC are looking to accommodate growth that supports the long-term function of the towns and villages and that delivers sufficient growth to provide much needed investment in infrastructure.

The strategy therefore focuses growth in and around the most sustainable settlements in the Borough, principally Hemel Hempstead, Berkhamsted and Tring through utilising urban land as well as through extensions to each settlement, which is an approach welcomed in principle and aligns with NPPF. Hemel Hempstead's growth will be focused through much greater urban intensification and the expansion of the town will be focused to the north and east of Hemel Hempstead, with land removed from the Green Belt to meet longer term needs.

The large villages of Bovington, Kings Langley and Markyate are relatively constrained in terms of local infrastructure and therefore, the strategy proposes only modest levels of growth in these settlements.

Highways England acknowledges that scale of growth for Hemel Hempstead will have an impact on the SRN, as will the proposals for Kings Langley due to the existing congestion towards the M25 J20.

The Local Housing Needs Assessment has helped DBC understand what their housing requirement. However, it is understood that the Government is proposing changes to the standard method in its recent consultations on the Planning Reform White Paper and related changes to the planning system. The plan has therefore been progressed on the basis of this new housing need calculation of 922 homes per annum (i.e. 16,596 homes over the period 2020-2038). DBC recognises that there are uncertainties over using this as their housing figure and state that they will keep this issue under review as they progress to the next stage of the Plan and make any necessary adjustments. Highways England agree with this approach and recommend that the inputs to the COMET modelling are updated and the models re-run as appropriate, as/ when the number/ location of houses (and jobs) is amended.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12460

**Person ID** 498378

**Full Name** Mr Paul Dunham

**Organisation Details** Clerk to the Council  
Kings Langley Parish Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	<p>The Borough's current reliance on Green Belt development to achieve its targets also runs counter to the Government's response to the local housing need proposals set out on 16th December 2020 in which it stated "... <i>that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt.</i></p> <p><i>We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places</i>". The Campaign for Rural England (CPRE) have also consistently pointed out that housing developments on Green Belt are invariably too expensive for those looking for a first home and do nothing to address the needs of younger people and families trying to put a roof over their heads.</p> <p>As a result, Green Belt development will do nothing to address the Borough's housing needs. It will also undermine one of the aims of the latest version of the Kings Langley draft Neighbourhood Plan (January 2021), namely "Providing homes in the parish that are financially accessible to younger people, especially young families and those stepping onto the property ladder for the first time".</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12467
<b>Person ID</b>	629143
<b>Full Name</b>	Mr Chris Briggs
<b>Organisation Details</b>	Spatial Planning Manager St Albans City & District Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Thirdly, as raised previously in DtC discussions, SADC considers that DBC will need to be able to evidence that it has fully explored all reasonable options within the land beyond the Green Belt and the AONB in north west Dacorum. This full exploration is in the context of the rest of South West Herts, including St Albans City &amp; District and Watford Borough in particular, being fully bounded by the Metropolitan Green Belt.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12480

<b>Person ID</b>	1269523
<b>Full Name</b>	RORY LUMSDON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I am commenting on all sites here: 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty. Although the Council 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 (including that of the hugely important Chilterns Beechwoods SAC), will cause significant harm to the Green Belt and AONB. 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.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12488
<b>Person ID</b>	1269524
<b>Full Name</b>	DAVID ATKINSON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	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, 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12505

**Person ID** 1269527

**Full Name** JULIAN SMITH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12528

**Person ID**

<b>Full Name</b>	
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>My objection to the Emerging Strategy for Growth for Dacorum (ESGD) concentrates on Tring because I live close to it and because the proposed changes to this town are so substantial. Nevertheless, the broad sweep of the proposals for Dacorum as a whole seem excessive in scale and ambition for a borough whose development potential, as the strategy paper notes, is limited by the fact that 60% of its land is protected either by AONB or Green Belt status. Development on this scale also runs counter to the council's environmental ambitions, especially in the light of the climate emergency declared in 2019.</p> <p>More specifically, I would like to raise the following points:</p> <ul style="list-style-type: none"> <li>o The overall ESGD plan adds 16,600 homes by 2038. There are currently 64,570 households in Dacorum. This development will thus increase that number by 25.7%. Clearly there will be further population growth over the period, but surely not on this scale? Indeed, the latest UK birthrate data indicates that the fertility rate is below the replacement rate. The level of immigration has also declined substantially. While there is unquestionably a need for more housing, especially affordable housing, such extensive building over the next 18 years may not be necessary. More than that, why the need to extensively compromise the fabric of a borough notable for its beauty?</li> <li>o The ESGD makes much of its ambitions to protect the environment, not least because the declared an environmental emergency in 2019. Inviting substantial increases in the population of a borough is surely not the way to achieve this. The typical CO2 emissions of a UK individual is 12.7 tonnes pa (Pauprint, verified by Mike Bernese-Lee), while the impact of building a two bedroom cottage is 80 tonnes (Mike Berners-Lee). This proposal will obviously create a major emissions impact.</li> <li>o Clearly there is a genuine demand for homes, but extensive building is not the only solution. The council could acquire housing from the existing stock to rent out, it could jointly buy properties with first time buyers, it could convert unused office and retail space post-pandemic and it could try to discourage the practice of leaving homes unoccupied.</li> </ul>

o The ESGD states that, “We have known for some time that the level of growth we need to plan for will be significantly higher than before (up from 430 dpa in the Core Strategy) and whilst the final figure from the Government may be adjusted again we expect this to remain a substantial number.” As a lay resident I do not know what 430dpa means, but presume it is suggesting that the borough find space for the development of a very significant numbers of houses. The ESGD acknowledges that the Chilterns AONB, “is a national landscape designation shared only by relatively few other authorities across the country.” (There are only 34 AONBs in England). Furthermore, there are potential plans to turn the area into a National Park, and according to the Council for the Protection of Rural England (CPRE), Dacorum’s Growth Strategy will undermine this ambition. So...

o Given that Dacorum is rare for being designated an AONB, why the imperative to build so substantially on the land in between, and release Green Belt? This development will clearly compromise the character and quality of life in the borough, not only for its residents but also for the wildlife, woods, flora and fauna. The gradual filling in of all the areas between these protected areas, and some of the protected areas themselves, is not the way to preserve the character and ecology of Dacorum.

o The ESGD’s proposed development of Green Belt runs counter to the Government’s own guidelines (16/12/20: “*that 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.*” The Ministry of Housing, Communities and Local Government has itself said that its projected housing numbers “*are not a target*”.

### Questions

o Why is not possible for the council to object to the level of development being imposed upon it by the government? The council has been elected by local residents to reflect their interests, and should surely defend those if the requirements of a national plan threaten to significantly damage the character and make-up of an unusual borough. More than that, attractive towns such as Tring and Berkhamsted are important not only for those that live in them but the wider country, forming an important strand of its character.

O Exactly what is the “emergency” that makes it ok to release Green Belt for development?

o What is the process if there is overwhelming resistance to the proposals from borough residents?

I have not repeated the objections fielded by the Town and Parish Councils of Dacorum (<https://www.berkhamstedtowncouncil.gov.uk/uploads/tp-1821-draft-letter-to-dbc.pdf> ) but I fully concur with them, especially as 95% of respondents to the 2017 consultation objected to development on this scale.

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12541
<b>Person ID</b>	1269544
<b>Full Name</b>	Ms Lindy Foster Weinreb
<b>Organisation Details</b>	Chairman Berkhamstead Citizens Association
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>We are horrified by the Draft Plan 2020 which provides for the excessive increases in the population and number of houses to be built over the Plan period 2020 -2038. We cannot agree to this as the projections by ONS do not support the increase planned for.</p> <p>Adopting the proposals in the Draft Plan results in substantial incursions into the Green Belt, including sites on the edges of Berkhamsted<sup>1</sup>, with adverse impact on parts of the AONB. The impact of Covid 19, will mean that large numbers of shops and office premises will be asking for change of use to residential, this has not been taken into account.</p> <p><sup>1</sup> The Draft Plan refers Berkhamsted with Northchurch</p> <p>To restate much of our reply to the 2017 Reg18 ‘consultation’, future development of Berkhamsted should be consistent with the Core Strategy [2006 – 2031] adopted as recently as September 2013. The house building rates and the Green Belt releases around the market towns that were suggested in some options (<i>to the 2017 proposals</i>) are a significant departure from existing policies in the Core Strategy. Adopting an option that requires large Green Belt releases around the market towns would mean that the Settlement Hierarchy described in the Core Strategy will have been abandoned notwithstanding what is asserted in the Draft Plan. The Core Strategy must carry significant weight in the development of the Local Plan.</p> <p>We note the Statement by the Minister of State Robert Jenrick of 16th December 2020 on the recent consultation (Changes to the Planning System Aug 2020) :</p> <p><i>“There were many 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 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 is crucial</i></p>

*that planning is more certain and more transparent, so we will explore how we can make this clearer through our longer-term planning reforms, including considering the right name for this approach.*

*There is widespread support for ensuring enough homes are built across England to ensure the needs of our communities are met. We heard clearly through the consultation that the building of these homes should not come at expense of harming our precious green spaces. We also heard views that this need can be better met in existing urban areas.”*

This conflicts with the proposed releases of Green Belt in the Draft Plan to meet the proposed allocation of housing, especially on the edge of the major settlements, across the Borough.

Moreover, 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.**”*

### **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.***

There are many examples that could be used, but we have limited ourselves to highlighting just six examples of guidance issued by Central Government that shows the policy on Green Belt protection is clear and unambiguous:

- The NPPF provides protection for Green Belt and the land due to be released around Berkhamsted clearly pass the
- In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming “demand for housing alone will not change Green Belt boundaries”.
- Paragraph 9 of the 2017 DCLG “Planning for the right homes in the right places: consultation proposals” 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. 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.”
- On December 16th 2020 the Government published a

response to the recent white paper consultations. With reference to protected landscapes and Green Belt it states, “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”

- The same response goes on to state “We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.”

- It further clarifies “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. In doing this they should take into account their local circumstances and constraints.”

DBC’s sole justification for accepting Government’s numbers (922dpa) as a strict target is simply that “*Any option below the standard methodology would have to be robustly justified*” (paragraph 5.8 of The Development Strategy Background Topic Paper).

Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, we fail to understand why DBC Planning felt unable or unwilling to make a case that can be “*robustly justified*”.

Indeed, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the new retrofit Borough Vision fails to reflect any of this.

We note that the urban capacity of Hemel Hempstead has been revisited in light of recent statements from Central Government on the opportunity to increase building heights in suitable locations. We question whether enough weight has been given to the prospective changes to town centres following the COVID19 crisis with many premises likely to be converted to include dwellings.

The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will have been deployed by 2020 (11 years ahead of target) while the rest of Dacorum lags behind target. Such disparities within Dacorum must be taken into account when assessing development numbers and site options going forward.

Infrastructure deficits are now evident across the Borough and only the provision of housing on large sites can deliver the necessary supporting infrastructure without detrimentally impacting on existing settlements. Notwithstanding, contributions from Developers’ S106 and CIL will not meet the full cost of investment in local infrastructure: that will require new Government funding without which residents will continue to suffer the adverse effects of infrastructure deficits.

The blanket assumption that large-scale growth makes delivery of infrastructure easier is misplaced – it will depend on the site and the viability. In the Dacorum Strategic Infrastructure Study [Feb. 2011] this is clearly stated:

*“By contrast there are certain types of infrastructure that are more sensitive to the location of demand. Ideally, these types of infrastructure should be located close to the population that they are intended to serve as the extent of the area that they serve (in other words their “catchment”) is very local.”*

It is manifestly the case that the infrastructure of Berkhamsted is not fit for purpose in relation to current needs let alone any future housing development of the scale proposed by this Draft Plan.

We refer in particular to:

**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.

**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.

**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.

**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.

**Infrastructure Development Plan:** The Draft Plan references 'Masterplans' to guide development of major sites. Notable for their absence are proposals that link or integrate the sites with the host community viz roads/walking/cycling/footpaths together with prospective costs which must be included in the respective IDP.

Comments on the Consultation Questions follow on the next pages.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12544
<b>Person ID</b>	1269544
<b>Full Name</b>	Ms Lindy Foster Weinreb
<b>Organisation Details</b>	Chairman Berkhamstead Citizens Association
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>We comment further at <b>5.A</b></p> <p>Policy SP2 – Spatial Strategy for Growth includes statement in 3 b.</p> <p><i>The Adopted Core Strategy (2013-2036) para 6.2.8 identified capacity (not “need”) in Berkhamsted of 600. Only eight years later this statement indicates that Berkhamsted will have an additional 1600 homes imposed upon it.</i></p> <p>The Town Centre already suffers from congestion and suspect air quality, viz data for Lower Kings Road shows the level of NO2 in some periods exceed the 40micrograms/cm3 limit, albeit that the annual record does not show exceedances. In many respects at its current size and topography the Town has reached the limits of capacity as evidenced by traffic congestion, shortage of school places at primary and secondary levels, GP and associated services, sports facilities and in-town open space. We dispute that the substantial increase imposed on the Town will enhance the quality of life for residents current or future.</p> <p>We welcome the sentiments of SP2. 4</p> <p>We have qualified support for SP2.5 with its comment on Neighbourhood Plans: additional growth may not be compatible with community aspirations for their locality.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12562
<b>Person ID</b>	1269544
<b>Full Name</b>	Ms Lindy Foster Weinreb
<b>Organisation Details</b>	Chairman Berkhamstead Citizens Association
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Spatial Strategy for Growth comment</b>	<p>We fail to be convinced that Berkhamsted and Tring should be developed to the extent proposed for 2021-2038: the capacity to absorb the growth of over 24% and 50% sustainably is questionable. Appending HH01 and HH02 to the existing urban network is likely to prove to be the more sustainable solution.</p> <ol style="list-style-type: none"> <li>1 Reconsider the allocations [which in any case we dispute as being justified see <b>Q 7</b>], and defer the release of BK01 from the 2021 – 2038 plan</li> <li>2 Re phase the implementation of HH02 to bring forward to 2021 – 2038</li> </ol> <p>This would bring forward some 4,000 homes which will be better located for employment opportunities.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12564
<b>Person ID</b>	1269554
<b>Full Name</b>	Ellen Satchwell
<b>Organisation Details</b>	Sustainable Development Lead Advisor - Thames Solent Team Natural England
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><b>Chilterns Beechwood Special Area of Conservation (SAC)</b></p> <p>The final Local Plan should give great weight to the protection of Chilterns Beechwood SAC. The site is particularly sensitive to traffic-related air pollution and recreational pressures, which are both predicted to increase as a result of planned development in the surrounding Authorities. We welcome the inclusion of the separate <i>Policy DM31 – Chilterns Beechwoods Special Area of Conservation</i>, which reflects the uniqueness of the SAC. <i>Policy DM31</i> should define ‘major’ and ‘minor’ developments to allow for consistency of application across the plan period.</p> <p><b>Air Quality/Pollution Impacts:</b> The Local Plan indicates a housing delivery target of 16,596 units by 2038. Whilst the contribution of this new development to air pollution impacts on the SAC is partially dependent on the chosen spatial development strategy, without effective cross-boundary cooperation with other Boroughs, it is unlikely that a likely significant effect on the SAC can be ruled-out. Natural England agree with the conclusions of the Habitats Regulations Assessment (HRA) screening opinion produced alongside the issues and options stage which concluded that a Likely Significant Effect (LSE) on the SAC cannot be effectively ruled out.</p>

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are additional nitrogen emissions as a result of increased traffic generation from developments, which can damage the SAC. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic [Footnote 1: The ecological effects of diffuse air pollution (2004) English Nature Research Report 580 Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency], which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species. Our guidance on how to assess road traffic emissions under the habitat regulations can be found here.

Natural England would welcome discussion on the Habitats Regulations Assessment (HRA) of the plan, especially in relation to any transport and air modelling work that may need to be undertaken to inform the HRA.

**Recreational Impacts:**

There is a growing pressure now on Chilterns Beechwoods SAC, arising from recreational pressure. The SAC is an attractive, accessible and open area of semi-natural habitat for recreation, especially walking and dog walking. With increasing residential development focussed towards Hemel Hempstead, Berkhamsted and Tring, close to the SAC they will experience further pressure from people using the designated site for recreation.

New housing within close proximity to Chilterns Beechwood Special Area of Conservation (SAC) has the potential to result in an increase in recreational pressures, such as:

- Contamination – including dog fouling, litter and spread of plant pathogens
- Trampling/wear – loss of vegetation, soil compaction, erosion, damage to trees from climbing
- Harvesting – removal of fungi and wood from the beech forests

We look forward to continuing the discussion with Dacorum Borough Council to assess the impact of recreational impacts at Chilterns Beechwoods SAC.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12591
<b>Person ID</b>	1269561
<b>Full Name</b>	Mr & Mrs Martin & Tracey Martin & Tracey Read
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12609
<b>Person ID</b>	1269554
<b>Full Name</b>	Ellen Satchwell
<b>Organisation Details</b>	Sustainable Development Lead Advisor - Thames Solent Team Natural England
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><b>Site Allocations</b></p> <p>Several of our points can be applied across all of the site allocation policies;</p> <ul style="list-style-type: none"> <li>We recommend that site allocation policies should reference to the retention of existing habitats, woodland and hedgerows, and creation of linkages of surrounding wildlife assets in order to comply with the NPPF, para. 175, '<i>if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused</i>'. The NPPF also stresses the importance (para 171) of taking a '<i>strategic approach to maintaining and enhancing networks of habitats and green infrastructure</i>'.</li> <li>It is Natural England's opinion that the vast majority of the site allocations should require an ecological management plan and subsequent ecological mitigation to be provided</li> </ul>

- All site allocations should require the provision of a measurable net gain in biodiversity, to remain consistent with 170 (d) of the NPPF.
- We recommend that where allocated sites are in close proximity to the AONB the policy should make reference to the need for a project level Landscape and Visual Impacts Assessment (LVIA) to ensure development is in line with *Policy DM27*.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12610

**Person ID** 1207604

**Full Name** Thames Water Planning Policy

**Organisation Details** C/O Savills  
Thames Water Planning Policy

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Strategic Comments**

It will be important for development within Dacorum to be aligned with any necessary sewerage infrastructure upgrades required to support growth. It is noted that the housing figures in the consultation document are based on the revised housing methodology consulted on by the Government in 2020. Following the decision by the Government not to progress the revised housing methodology it is understood that the housing figures in the Local Plan may increase. Thames Water are keen to work closely with the Local Planning Authority to understand the location and phasing of development so that the impacts on sewerage infrastructure and the capacity of sewage treatment works can be understood.

Dacorum is served by a number of sewage treatment works (STWs) including Maple Lodge STW within Three Rivers District Council and a number of smaller STWs located around the district. While development in areas that drain to Maple Lodge STW are unlikely to result in any issues, development in the catchment of smaller STWs may require upgrades ahead of development being occupied. It is therefore important to understand the location and phasing of development so that any necessary upgrades can be planned and delivered. This may require housing allocations in areas draining to STWs that require upgrades to be phased later in the local plan period.

**Site Specific Comments**

A high level review of the proposed site allocations has been undertaken and comments are appended to this letter for information. It will be important to further review any changes to housing allocations or the scale of development and timing of delivery to ensure that development is aligned with any necessary sewerage network or sewage treatment work upgrades.

<b>Included files</b>	<a href="#">21.03.03 L CC Dacorum Local Plan Consultation.pdf</a>
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12672
<b>Person ID</b>	1269581
<b>Full Name</b>	Vistry Homes
<b>Organisation Details</b>	Vistry Homes
<b>Agent ID</b>	979742
<b>Agent Name</b>	Mr Robert Love
<b>Agent Organisation</b>	Senior Planning Associate BIDWELLS
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><b>Housing Need and Housing Land Supply</b></p> <p><u>Minimum Housing Need</u></p> <p>The Council have made an error in setting out a housing requirement based on the application of the Local Housing Need (LHN) Standard Methodology published as part of the consultation ‘Changes to the current planning system’ by the Government on 6th August 2020. Since the publication of the Emerging Strategy for Growth, it has been confirmed that the LHN Standard Methodology set out in the August 2020 consultation will not be adopted and instead, the previous LHN Standard Methodology will be utilised, but with an uplift of 35% for the 20 authorities in England with the largest proportion of the city or urban centre’s population.</p> <p>The implication of this approach is that the Council have used assumed a base housing requirement of 923 homes per year, instead of the correct figure of 1,023 homes per year. This results in the Emerging Strategy for Growth catering for a minimum of 16,595 homes instead of the required minimum of 18,414 homes up the year 2038. This equates to a shortfall of some 1,819 homes. This is a significant shortfall which will have to be rectified prior to publication of the Pre-submission Version (Regulation 19) of the Dacorum Local Plan (2020-2038) being subject to further consultation.</p>

### Future Methodology Changes

The LHN Standard Methodology calculation factors in affordability ratios. New affordability ratios are due to be published in March 2021 which will need to be taken into account in the next iteration of the Local Plan which may have an impact of increasing the minimum housing need further for the Borough.

Although we are not aware of any further changes to be introduced prior to the preparation of the Pre- submission Version, it will be important that the Council does not pre-empt the formal introduction of any revision or new figures and works to the LHN Standard Methodology in place at the time the Local Plan is prepared.

### Unmet Housing Need from Elsewhere

It is acknowledged that the Emerging Strategy for Growth is seeking to meet Dacorum Borough's housing need within its administrative boundary, which is laudable. However, it is also important that the Council give consideration towards the need to meet unmet housing needs elsewhere, even if the Council do not feel it is possible for the Borough to absorb further growth from elsewhere.

Not only is this a practical point, with the issue needing to be considered with neighbouring authorities as part of a 'constructive, active and ongoing process' to ensure the duty to co-operate can be satisfied, it is also a factor which could drive the housing requirement for the Borough up further.

In particular, the area's strong links with London, with increasing migration over the last 10 years, means that Dacorum Borough is likely to be affected by the inability of London to meet its own housing need. The London Plan anticipates delivery of some 52,000 homes per year moving forward, significantly below the need of London, but also well above the historically delivery rates of around 33,000 homes per year.

Without the Dacorum Local Plan (2020-2038) making an allowance to meet London's unmet housing needs, it is likely that the migratory links between the two areas will lead to a negative impact on the affordability of housing in the area.

### Housing Land Supply

As noted above, due to the use of the incorrect LHN Standard Methodology for establishing the minimum housing need, the Emerging Strategy for Growth will already fail to deliver the level of housing required in the area.

However, in addition to this shortfall of some 1,819 homes, the development strategy also builds in insufficient flexibility and contingency on the housing land supply side for the Local Plan to be considered robust. Currently, the Emerging Strategy for Growth includes just a 2% buffer in housing land supply (303 homes – paragraph 7.128). This level of contingency is wholly insufficient, both in percentage terms and as an absolute number.

It is common for Local Plans to build in at least a 10% contingency on the housing land supply side to allow for unexcepted delays in the delivery of sites, changes in site capacity, under delivery of windfall, etc. In some cases, the buffer is 20%. The need for such a buffer depends on the risk associated with the overall strategy, the particular nature of the sites proposed for allocation – with larger, more complex sites justifying the need for a larger buffer in supply, and the step change in delivery being sought, which in Dacorum is significant given the current adopted Local Plan (Core Strategy) target of 430 and recent delivery rates averaging around 544 homes over the last three years. This suggests the need for a buffer nearer to 20%.

The implication of a 10% buffer on top of the minimum housing need of 18,414 is that the Dacorum Local Plan should plan for the delivery of 20,255 homes. A 20% buffer would mean the Local Plan planning for 22,097 homes. These figures suggest that the planned housing supply in the Local Plan is between 3,355 and 5,197 homes below where it needs in order for it to be robust.

This is a significant shortfall which can only be rectified by the additional sites being identified across the Borough for housing allocations in the Local Plan.

The second part of the housing land supply equation is the need to ensure that supply is not backloaded and that on adoption, the Council will be able to demonstrate a deliverable five-year supply of deliverable housing land is in place. This means that any additional sites need to be capable of delivery early in the plan period, suggesting the need for deliverable small to medium sized sites to be identified as opposed to large, strategic sites with long lead in times and significant infrastructure requirements. As discussed further below, our clients land at Berkhamsted falls into this category.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12677

**Person ID** 1145844

**Full Name** Dr and Mrs Melvyn Else

**Organisation Details**

**Agent ID** 979742

**Agent Name** Mr  
Robert  
Love

**Agent Organisation** Senior Planning Associate  
BIDWELLS

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

**Spatial Strategy for Growth comment**

Unmet Housing Need from Elsewhere

It is acknowledged that the Emerging Strategy for Growth is seeking to meet Dacorum Borough's housing need within its administrative boundary, which is laudable. However, it is also important that the Council give consideration towards the need to meet unmet housing needs elsewhere, even if the Council do not feel it is possible for the Borough to absorb further growth from elsewhere.

Not only is this a practical point, with the issue needing to be considered with neighbouring authorities as part of a 'constructive, active and ongoing process' to ensure the duty to co-operate can be satisfied, it is also a factor which could drive the housing requirement for the Borough up further.

In particular, the area's strong links with London, with increasing migration over the last 10 years, means that Dacorum Borough is likely to be affected by the inability of London to meet its own housing need. The London Plan anticipates delivery of some 52,000 homes per year moving forward, significantly below the need of London, but also well above the historically delivery rates of around 33,000 homes per year.

Without the Dacorum Local Plan (2020-2038) making an allowance to meet London's unmet housing needs, it is likely that the migratory links between the two areas will lead to a negative impact on the affordability of housing in the area.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12682

**Person ID** 1269591

**Full Name** Ross Campbell

**Organisation Details** Client Director  
Aberdeen Standard Investments

**Agent ID** 1269593

**Agent Name** Jessica  
Wilson

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Policy SP2 – Spatial Strategy for Growth**

DBC's objective to provide a minimum of 16,596 homes throughout the plan period is supported and it is considered that the Site can assist in ensuring this target is met.

The primary focus of strategic growth and investment being in Hemel Hempstead is also supported. It is agreed that Hemel is the most appropriate place across the borough for intensification through increased heights and densities. The objective to ensure that development coming forward in the existing urban area should ensure that previously developed land is optimised is also supported. The Site is a clear example of sustainably located previously developed land and we would therefore expect DBC to support proposals which seek to make the most efficient use of it, as is required by the NPPF (2019).

The policy states that DBC will aim to achieve ‘*no net loss of office floorspace from 2025 onwards*’. Given the current pandemic and its lasting impacts, it is considered unreasonable to include such a prescriptive target within emerging planning. The pandemic has and will continue to result in a modal shift in behaviours relating to how people and businesses choose to operate. It is noted that the Foreword makes reference to the Covid-19 pandemic and that DBC have already completed a considerable amount of supporting work in the Evidence Base documents, but arguably the biggest change which has come to light during the pandemic is working patterns and this should be accounted for in new planning policy.

The NPPF (2019), Section 6 states that planning policies should ‘*set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*’ and also ‘*be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation) and to enable a rapid response to changes in economic circumstances*’. The proposed wording in this respect is not considered in accordance with these requirements of the NPPF (2019). Whilst we understand that a protectionist approach to employment land is not unreasonable, there must still be flexibility or an ability to allow controlled change as part of the planning balance.

The policy needs to take a multi-dimensional approach considering factors such as market signals, quality of accommodation and marketing routes with reasonable timeframes to allow the planning balance to be applied. The Site in this case has been marketed since February 2020 and has not received suitable interest from any office occupier. The approach should allow for market-led policy rather than a policy-led market.

An amendment could be to instead include a figure based on the latest relevant Evidence Base documents; however this is likely to encounter similar issues relating to the pandemic as set out above (i.e. the difficulty with currently forecasting accurately). It is therefore proposed that the policy wording is instead amended to read ‘*an appropriate level of office floorspace in accordance with the latest demand figures*’.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12695

**Person ID** 1269597

**Full Name** Ms STEPHANIE HOWE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	You cannot build this number of houses taking 2000 acres of green belt and consider that a sustainable development. This will mean all the individual villages will be eaten up in an urban mass with only token green spaces in between them. It will have a big impact on the Chilterns AONB, completely ruining the area.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12701
<b>Person ID</b>	1264257
<b>Full Name</b>	Pam Beeby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I object to the Local Plan especially in regard to the following:</p> <p>The NPPF allows local authorities to restrict the scale of development due to other planning restraints including impacts on greenbelt and areas of outstanding natural beauty</p> <p>NPPF purposes:</p> <ol style="list-style-type: none"> <li>1 checking urban sprawl</li> <li>2 to prevent neighbouring towns from merging</li> <li>3 safeguarding the countryside</li> <li>4 preserve the setting and character of historic towns</li> <li>5 urban regeneration by the use of and recycling of derelict and other urban land and well served by public transport</li> </ol> <p>I don't believe the Vision set out in the Local Plan is sympathetic to the aims of the NPPF. Except what they believe to be a central government requirement builds 16,596 new homes over the next 18 years. The method of determining these numbers has disproportionately affected Dacorum and the numbers and the method by which they were arrived at should</p>

have been challenged. Particularly that the figures have been based on out of date ONS figures, when more recent ones are available.

The number of houses proposed for Berkhamsted and Tring are just too great for the towns and they will lose their market town identity.

It's not just about increased housing it's also the loss of things as a consequence. Walks recreation views and mental health

Climate emergency is already acknowledged - zero emissions by 2030 cannot be met by reducing greenbelt, and conditions required to be met on all new builds will increase cost to build and lower their affordability.

Greenbelt should not be used unless all other locations have been considered. Once greenbelt is released to developers it will be gone forever. It cannot be undone

Loss of greenbelt leads to reduction in air quality and an increase in noise pollution. Priority should be given to brownfield sites and windfall sites, the availability of which in post pandemic conditions may have changed.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12709

**Person ID** 1269600

**Full Name** Alex Marsh

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is

really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12769

**Person ID** 1269624

**Full Name** David Burne

**Organisation Details** Redington Capital

**Agent ID** 1269623

**Agent Name** Mark  
Harris

**Agent Organisation** Associate  
Bidwells LLP

**Yes / No**

\* **Yes**

\* **No**

**Spatial Strategy for Growth comment**

**The Development Strategy**

Policy SP2 of the draft Local Plan, the Spatial Strategy for Growth, sets out that the Hemel Hempstead, along with Tring, area will be the focus of growth over the plan period as the two main centres in the area. This approach is supported by Redington Capital as Hemel Hempstead is the most sustainable settlement in the area, and the best placed to support an increased population.

In the policy there is a criterion which sets out that the Local Plan will make provision for '*no net loss of office floorspace from 2025*'. From review of the evidence, it is unclear how this aspiration has been established.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12778

**Person ID** 1269628

**Full Name** Steven Bragg

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify</p>

development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12803

**Person ID** 1144694

**Full Name** Mr Barry Fuller

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

- The plan suggests that Berkhamsted and Tring take their 'fair share' of new housing. However that doesn't take into account the geographical constraints of Berkhamsted and the massive loss of Green Belt land.

- Development should be predominantly concentrated around Hemel Hempstead which is the natural centre of local employment, infrastructure, transport hubs, civic amenities etc.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12816

**Person ID** 1269634

**Full Name** Frank Worth

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** —The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12841

**Person ID** 1145801

**Full Name** Mr Guy Barlow

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>Spatial Strategy for Growth comment</b>	<p>Water supply and waste water disposal</p> <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>Geographers say there are only 210 true chalk streams anywhere in the world and the Chilterns is home to 9 of these rare and precious habitats. The siting of housing must not be allowed to degrade these special places.</p> <p>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This would take many years to complete, and be extremely expensive as well as disruptive to affected communities.</p> <p>I also think that from a transport perspective that the plan is not sustainable. Berkhamsted's roads are already heavily congested and the proposal to build over 2,000 new homes in the town in the next 19 years period will bring gridlock to the towns transportation system and also place too much demand on the towns services and schools.</p> <p>Nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.</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> <p>Delivering Infrastructure to support growth – the IDP fails to adequately address issues, including traffic, water and wastewater, and is incomplete which reflects the reality that infrastructure always lags the development it is meant to serve This is very obvious in Berkhamsted.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12857
<b>Person ID</b>	1269653

<b>Full Name</b>	Tony Dowle
<b>Organisation Details</b>	Director Rathbawn Properties Ltd
<b>Agent ID</b>	1269652
<b>Agent Name</b>	Miss Lucy Morris
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><b>URBAN CAPACITY, GREEN BELT AND THE AONB</b></p> <p>Policy SP2 sets out the Council spatial strategy. Within this policy, it notes that the primary focus of strategic growth and investment will be in Hemel Hempstead and supported by growth at Berkhamsted and Tring.</p> <p>A total of 10,600 homes are to be delivered in Hemel Hempstead which includes a minimum of 1,500 homes to be delivered through an urban extension to North Hemel (with a further 4,000 homes to be delivered in this location beyond the Plan Period). A total of 2,200 homes are directed to Berkhamsted and 2,700 homes to Tring.</p> <p>The Green Belt and Rural Areas Topic Paper (November 2020), published alongside the emerging Local Plan for consultation, sets out the exceptional circumstances for the release of land from the Green Belt.</p> <p>At paragraph 7.7, the paper states that:</p> <p><i>“The Council has explored all reasonable options to meet its identified need for development without developing in the Green Belt. This should be seen in the context that the Borough is highly constrained and this has limited our available options. Nonetheless, there remains a strong urban focus on the towns and larger villages as sustainable locations for accommodating development and infrastructure needs. Indeed, the draft Plan policies will actively encourage this approach.”</i></p> <p>It is agreed that the Borough is highly constrained and that it is not possible for the Council to meet its identified need without some development in the Green Belt.</p> <p>As set out within the Urban Capacity Study (November 2020), the estimated capacity within existing settlements is 10,440 homes. This is well below the level of housing required and the Council cannot rely on all the sites coming forward in order to produce a sound and robust plan.</p> <p>The Site Selection Topic Paper (November 2020), interrogates the level of urban capacity available, including existing allocations, commitments and windfall allowances. It concludes that 10,954 dwellings can be expected to be delivered</p>

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 Council considers that it has optimised the level of housing delivery in the urban area and no more capacity can be found from this source.

This lack of urban capacity and the high level of housing need means that DBC **must** look at Green Belt and other designated areas including Areas of Outstanding Natural Beauty (AONB) to deliver this housing.

AECOM's Site Assessment Study Volume 1 (September 2018) prepared on behalf of the Council, indicates that there is capacity for 15,135 dwellings in the Green Belt (the Council's Site Selection Topic Paper (November 2020), reduces this to 14,897 dwellings). Whilst the headline figure indicates that the Council can meet and exceed its housing requirement when combining urban capacity and Green Belt capacity, it does not mean that all the Green Belt sites are appropriate for development, or that they will come forward in the Plan Period.

It is understood that the Green Belt capacity figure has not been subject to a review of the contribution of each parcel towards the purposes of the Green Belt, as outlined in paragraph 134 of the NPPF.

Another important consideration is how these sites fit into the spatial strategy when taken as a whole. The NPPF is clear at paragraph 138 that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. At this stage, it is not expressly clear how this has been taken into consideration when determining whether many of these potential dwellings would be located in smaller settlements and whether this level of growth be in proportion to the size of the settlement.

It is also noted that the Site Assessment Study was only undertaken on 144 sites identified by DBC. It notes that these have come from various sources and had not filtered before AECOM's review. However, it is not clear from the Assessment what these sources are. Further, the Planning Practice Guidance (PPG) at paragraph ID 3-010-20190722 states that:

*"It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area."*

It is clear therefore, that DBC should be active, not just passive in site searches, and should consider sites which may not have been actively promoted during the Call for Sites process.

The Site Selection Topic Paper (November 2020) notes at paragraph 3.74 that the outstanding identified housing need (once the urban capacity sites have been taken into consideration), cannot:

*"reasonably be located either in whole or in part in the Chilterns AONB as there is insufficient land available for development and any substantial allocations would be contrary to national policy, namely that it would not conserve or enhance this national important designation (Paragraph 172 of the NPPF)."*

This is in the context as to whether there are any other reasonable options for meeting need **before** releasing land from Green Belt, not in conjunction. It also stems from the basis that residual housing need would be met as a whole within the AONB, rather than considering that some housing could come forward in the AONB and some from the release of land from the Green Belt. This binary approach does not take account of site specific contexts and does not adequately justify the discounting of all sites within the AONB for further consideration.

The Site Selection Topic Paper notes at paragraph 5.2, under the key issues, that:

*“The approach undertaken by AECOM for sites in the AONB was to discount [sites] where they are over 0.5 hectares, unless they comprised of previously developed land.”*

The Council’s justification for this is set out at paragraphs 5.5 and 5.6.

*“The Council’s approach to site selection...is to first consider if there is sufficient sites available on land outside of the Chilterns AONB, including the consideration of (reasonable) alternative sites, which are capable to meet the development strategy of the Local Plan. If this approach concluded that there was an insufficient amount of land/sites capable of meeting future needs, then there would be a greater justification to consider in further detail those sites located in the AONB.*

*The review at Stage 6 demonstrates there are sufficient sites that are available, and therefore the Council considers it appropriate to not carry forward any sites in the AONB for detailed testing. The development strategy reflects the Council’s commitment to protect the special characteristics of the Chilterns AONB through the new Local Plan, and considers the approach taken is soundly based.”*

In the Site Assessment Study, the AONB was immediately discounted at the outset, without considering how some sites located in the AONB could contribute less to the purposes of the Green Belt, as well as to the AONB and therefore could be acceptable sites for housing, subject to appropriate mitigation.

This approach is inconsistent with the PPG which states that [emphasis added]:

*“Identified sites, which have particular constraints (such as Green Belt), need to be included in the assessment for the sake of comprehensiveness but these constraints need to be set out clearly, including where they severely restrict development. **An important part of the desktop review, however, is to identify sites and their constraints, rather than simply to rule out sites outright which are known to have constraints.**” (Reference ID: 3-010- 20190722)*

Again, this demonstrates the issues with the binary approach undertaken by DBC and the lack of flexibility in its site selection process. What is also not clear is whether the whole site needed to comprise of previously developed land for it to be taken forward through the selection, or whether only part of the site comprising previously developed land was considered sufficient. It is argued that a more positive and justified approach would be to include sites within the AONB where part constituted previously developed land. This would enable a more robust analysis of potential sites where more consideration is given to the individual site context and its contribution to the AONB.

It is agreed that exceptional circumstances do exist for the release of sites from the Green Belt. However, the Council should also consider suitable sites that may be located in the Chilterns AONB. It is recommended that the Council reviews its decision to omit virtually all sites located within the AONB and includes land within the AONB for consideration to deliver housing.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12859

<b>Person ID</b>	1269653
<b>Full Name</b>	Tony Dowle
<b>Organisation Details</b>	Director Rathbawn Properties Ltd
<b>Agent ID</b>	1269652
<b>Agent Name</b>	Miss Lucy Morris
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p><b>BERKHAMSTED</b></p> <p>Policy SP20 (Delivering Growth in Berkhamsted) states that Berkhamsted will deliver at least 2,236 dwellings over the Plan Period, with 1,876 homes being delivered through allocations.</p> <p>Policy SP23 (Delivering Growth in Tring) sets out that at least 2,731 dwellings will be delivered in Tring, with 2,274 of these delivered through allocations.</p> <p>Whilst it is acknowledged that both Tring and Berkhamsted are in the same sustainability level (Market town) as described within the Settlement Hierarchy (October 2017), Berkhamsted is the second largest urban area within DBC and is considerably larger than the next largest urban area, Tring <small>[Footnote 3: In 2011, Berkhamsted had a population of 20,542 people compared to Tring with a population of 11,713 (Settlement Profiles Paper, October 2017)].</small> The Settlement Profiles Paper (October 2017), shows that neither settlement has increased in size significantly, in terms of additional dwelling since the last census in 2011.</p> <p>The disparity in size between these two settlements is not reflected in the spatial strategy. Tring is set to deliver 495 more homes than Berkhamsted over the Plan period, despite it being the smaller of the two settlements.</p> <p>Using the 2011 data on the number of existing dwellings, Tring will see a 54% increase in the number of dwellings as a result of allocations, whereas Berkhamsted will see a 24% increase. Given its high level of sustainability, it is considered that Berkhamsted has greater capacity to deliver housing.</p> <p>As previously set out, the increase in the Council's housing target to 1,023dpa, will mean that it needs to find a <b>minimum of 1,818 additional dwellings</b> over what is currently being proposed, in order to achieve the minimum requirement of 18,414 dwellings over the Plan period.</p> <p>DBC should seek to exceed this 18,414 figure in line with the Government's objective to deliver 300,000 homes a year by the mid-2020s and to significantly boost the supply of homes, as set out in paragraph 59 of the NPPF. The Council</p>

needs to ensure that it increases housing supply in order to maintain a five year supply of deliverable homes and ensure that it does not fall back to the current position where housing supply is at a critical level.  
It is proposed that some of these additional dwellings can be sustainably accommodated in the Berkhamsted area.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12873

**Person ID** 1269665

**Full Name** Mr Martin Hicks

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The aims are laudable. The means of achieving delivery in respect of land management are wholly lacking. Consequently, it is undeliverable.

Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites are a key principle of the Strategy. However, this conflicts with some site allocations in Tring and Hemel Hempstead.

There is a danger that increasing retail floorspace will severely degrade the very character of retail that still generates local distinctiveness and trade in the town; for example, building on the Auctions - one of the most distinctive enterprises in the Borough, as well as market site and museum - is a nonsense. How this will enhance the town centre is not credible. In respect of delivering a local economy and society - it is not sustainable.

I support Policy SP6 to reinforce the role of the town centre and support proposals which will maintain its vibrancy. However, it is not appropriate to bring forward a mixed use retail led development including a medium sized supermarket at the High Street/Brook Street town centre site (Growth Area Tr06), or encourage a supermarket on the Dunsley Farm Growth Area (Growth Area Tr01) if the town centre site cannot be delivered.

The Brook Street site already plays a highly important part in the economy and character of Tring - even if it is not in regular use. Furthermore, there is already a supermarket opposite Dunsley Farm, which also supports a Farm Shop and Brewery, two locally distinctive and highly successful enterprises which should be supported, not undermined by another supermarket. Surely this is better located where the majority of the new development is proposed? East of Tring. The nature of Tring is highly vulnerable to such misguided proposals which will have the opposite effect of achieving a sustainable Market Town. All it will do is provide a Sustainable Supermarket town. I do not consider this is a sensible or sympathetic approach to planning a town's future.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12913

**Person ID** 1269666

**Full Name** Mr Andrew Oliver

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** The plan does not address if or how the housing will be carbon neutral, or how the carbon released by building on green belt land will be offset.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12923

**Person ID** 1269668

**Full Name** Sally Chrispin

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I appreciate that we are facing a housing shortage and that homes have to be built somewhere but I have several objections to the local plan put forward by Dacorum Borough Council (DBC). I also appreciate that DBC's hands are tied to some extent to dictats from the government.</p> <p>I wish to object to the "Emerging strategy for growth 2020-2038" local plan as follows:</p> <ol style="list-style-type: none"> <li>1 I only received a copy of the publication from Dacorum Borough Council on Monday 22 February. I am lucky that I have been aware of the plan for some time through social media, but other residents in Covert Road are elderly and may not have ready access to the internet. 5 days is not enough to look into this in more detail – particularly as the library is not open for these people to use resources there. The period for consultation should be longer and after we are back to a more normal life.</li> <li>2 I believe that the number of proposed houses calculated in the plan is flawed. It has been calculated based on an algorithm that has since been ditched by the government and the council has based its calculation on ONS data from 2014 which is outdated and doesn't take into account builds since then. I believe that the proposal should take into account the most up to date data, which I understand is the 2018 ONS data, which would reduce the number of proposed houses substantially.</li> <li>3 The amount of green belt land lost if the proposals are accepted is excessive and the council does not appear to have taken account of the National Policy framework which allows local authorities to restrict the scale of development due to other planning constraints.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12968
<b>Person ID</b>	1264971
<b>Full Name</b>	Louise Watson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>The local plan says very little about sustaining villages; we want vibrant self-sustaining villages that are not just dormitory settlements.</p> <p>This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan</p> <p>Northchurch has not been recognised at all. It has been called West Berkhamsted instead.</p> <p>The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.</p> <p>There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS12990
<b>Person ID</b>	1269778
<b>Full Name</b>	STEPHEN BLADEN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to the Dacorum 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 stock which would irrevocably change the character of our towns and villages and destroy valuable green belt habitat and amenity. In particular this impacts Tring where a 55% growth in households is planned. Dacorum Borough have chosen to accept these Central Government</p>

imposed growth figures without challenge and they are not substantiated by evidence and are based upon outdated ONS projections and an arbitrary and simplistic algorithm.

I support the need for a local plan and accept the need to build a reasonable number of new sustainable and affordable properties in Dacorum. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects.

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 already pressure on these services and this would only increase with this projected growth given it is unsupported by a commensurate growth in infrastructure. There is little sustainable about the construction nor preserving of our heritage about this plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS12997

**Person ID** 1059698

**Full Name** Mr Richard Lyne

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

That you want Hemel to have a vibrant town centre is of course good. However, have you thought through the wider post-pandemic and post-Brexit trends that are clearly starting to emerge?

Specifically, the lack of any cultural venue (thank you, Borough Council) will not help attract people into the town. Your plan for a retail-led development of the former Market Square in Hemel is risky and blind to currently changing retail trends. You cannot really want a litter-strewn take-away paradise by the water gardens, can you?

Please stop and think through the provision of cycle lanes and pedestrian routes. That on Station Road just has not worked and is hazardous to both cyclists and those on foot. The lessons from that need learning before setting future policy.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13005

**Person ID** 330928

**Full Name** Mr James Gregory

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Environmental Impact: the increased water sourcing will damage/destroy the chiltern aquifers and chalkstreams which are of major ecological importance.

Building in such concentration around Shootersway area and it's junction with Kingshill/Kingshill Way is irresponsible. Shootersway is located on the ridge of a long hill with 5% inclines which creates a major water supply and sewerage management problem. Water run off in inclement weather from the new buildings/civil works will create a bigger water run off hazard affecting the already existing problem of flooding down the hill. Traffic is already a problem in this area; increased housing will add to the hazard and exacerbate the danger to young children who have to use the single width pavement or no pavement to access the only state secondary school in the town. The environment is already impacted as many parents drive their children a short distance to the school to avoid them having to navigate this area.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13013

**Person ID** 1164731

**Full Name** Deborah Turnbull

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p> <p>I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.</p> <p>The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.</p> <p>I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.</p> <p>Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.</p> <p>I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This</p>

Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13014

**Person ID** 1164731

**Full Name** Deborah Turnbull

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p>

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamsted, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13024

**Person ID** 1164731

**Full Name** Deborah Turnbull

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13026

**Person ID** 1269882

**Full Name** KATHRYN HALLETT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

think the plan is not suitable for promoting sensible sustained growth that does not irreparably damage Dacorum.

The strategy seems to be concentrating business development in the eastern side of the district particularly in the garden city area on the border with St Albans. This would logically match the proposed expansion of houses in Hemel Hempstead.

However large expansions of housing in Berkhamsted and Tring are being proposed without the same increase in economic growth in the towns. This would only result in increased traffic congestion by commuter traffic across the district.

In both towns the level of housing is being increased without a matching increase in town centre infrastructure to cope with it. There has been some proposals to increase shops in Tring but this means demolishing several key buildings including the fire station and local history museum.

These are both buildings that are important for Tring's civic character and culture.

In Tring the housing would also increase the town's area by approximately 25% and will cover part of the Chilterns Area of Outstanding Natural Beauty which will be lost forever. It would also ruin the appearance of this unique market town which was largely built by the Rothschilds.

The housing development currently being built in Tring seems to be extremely out of character and very anodyne. If the other developments are like this then Tring will become characterless and dull.

I think that Dacorum should reduce the housing programme in general as with evidence from the recent Covid pandemic there will be less need to be located in close proximity to London. This is due to more people choosing to work from home.

With Brexit there will probably be a contraction in the business sector and little business growth in the area so less housing will be needed for it locally. The promotion of the Northern power house by the central government may even lead to expansion in that region rather than Dacorum.

In conclusion I think the plan needs to be revisited in light of recent events.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13042
<b>Person ID</b>	1270013
<b>Full Name</b>	Mr Daniel Ritchie
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1.</p> <p>The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13073
<b>Person ID</b>	1270019
<b>Full Name</b>	Ms Clare Kirwan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The Governments housing policy has lost all touch with planning in the countryside. Houses built in the countryside have an intense local impact. Local people should be granted the right to control the amount, pace and infact the nature of any settlements in their communities, if they are required.</p> <p>Planning rules deny this and infact dictate that local people will loose any say in these matters and therefore allowing free reign to developments.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS13146
<b>Person ID</b>	1270066
<b>Full Name</b>	Dr Amanda Cole
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (Changes in the Current Planning System of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13166
<b>Person ID</b>	1270069
<b>Full Name</b>	Patrick Moloney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
<b>* Yes</b>	

* No	
<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13180
<b>Person ID</b>	1144725
<b>Full Name</b>	Mr Philip Anderson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	—The delivery strategies rely on the release of Green Belt land. There is no justification for the release of this land. The housing target is not a true reflection of objectively assessed need for the area. The Green Belt across the Borough is really important to people who live here now, but also for future generations. It is our duty to preserve the Green Belt in perpetuity. This plan fails in this duty and I cannot support this.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13195
<b>Person ID</b>	1270127
<b>Full Name</b>	Amy Moloney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>• The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.</li> <li>• This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.</li> <li>• Northchurch has not been recognised at It has been called West Berkhamsted instead.</li> <li>• The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology</li> <li>• There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13208
<b>Person ID</b>	1270128
<b>Full Name</b>	Richard Salway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Spatial Strategy for Growth</p> <p>The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1.</p> <p>The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13226
<b>Person ID</b>	1267440
<b>Full Name</b>	Mick Maloney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>As a former Councillor I'm disappointed to read the Council are considering a development plan that means building on existing green belt land.</p> <p>Where to build and how best to make use of land in the Dacorum area is not a new problem, for us or any other local council. I'm sure we all agree we need new homes but these ALL need to be affordable. They need to be COUNCIL homes, not run by Housing Associations that make money from all the 'services' provided – gardening, decorating communal areas, managing parking, etc.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13228
<b>Person ID</b>	1270134
<b>Full Name</b>	Mrs Louise Bladen
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to the Dacorum 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 stock which would irrevocably change the character of our towns and villages and destroy valuable green belt habitat and amenity. In particular this impacts Tring where a 55% growth in households is planned. Dacorum Borough have chosen to accept these Central Government imposed growth figures without challenge and they are not substantiated by evidence and are based upon outdated ONS projections and an arbitrary and simplistic 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 Dacorum. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects.</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). There is already pressure on these services and this would only increase with this projected growth given it is unsupported by a commensurate growth in infrastructure. There is little sustainable about the construction nor preserving of our heritage about this plan.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13252
<b>Person ID</b>	1270147
<b>Full Name</b>	Ms Rhian Windridge
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	We call for fewer houses to be built on green belt land and for the Local Plan to have the climate emergency fully integrated into its targets and objectives.

Dacorum Green Party strongly objects to the Dacorum 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. This growth in household numbers is a 25% increase over the current housing stock. 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 simplistic algorithm.

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. 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.

Dacorum Greens 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. We are calling for all new buildings to 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.
- We demand that the 40% minimum affordable homes objective is 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. We 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 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. I must demand that the Local Plan prioritises this.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13254

**Person ID** 1270148

**Full Name** Mr Carl Blackwell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate

Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has “delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites.” This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to

the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13255

**Person ID** 1270148

**Full Name** Mr Carl Blackwell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13266
<b>Person ID</b>	1270148

<b>Full Name</b>	Mr Carl Blackwell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13267

<b>Person ID</b>	1270154
<b>Full Name</b>	Ms Alison Purdy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Spatial Strategy for Growth comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13269
<b>Person ID</b>	1270154
<b>Full Name</b>	Ms Alison Purdy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I have significant concerns about Dacorum's proposed Local Plan, titled "Emerging Strategy for Growth 2020-2038". 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. This is the equivalent of 1,214 football pitches, and would cause irreparable harm to the environment. I believe the Council's growth strategy fails to address the climate emergency and the impact on infrastructure, and underestimates the potential to provide housing on existing developed sites.

Green Belt land is threatened at Berkhamsted, Tring, Hemel Hempstead, Kings Langley, Bovington and Markyate.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13270

**Person ID** 1270154

**Full Name** Ms Alison Purdy

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty. Although the Council 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 (including that of the hugely important Chilterns Beechwoods SAC), will cause significant harm to the Green Belt and AONB. 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13271

**Person ID** 1270154

**Full Name** Ms Alison Purdy

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Spatial Strategy for Growth comment</b>	<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. In my view, 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 need 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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13272
<b>Person ID</b>	1270154
<b>Full Name</b>	Ms Alison Purdy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Spatial Strategy for Growth comment</b>	<p>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.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13274

<b>Person ID</b>	1270154
<b>Full Name</b>	Ms Alison Purdy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13280
<b>Person ID</b>	1270157
<b>Full Name</b>	Ms Claire Laing
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure or 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use or guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment or brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the

existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemet Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to

reduce impact on infrastructure. At Paragraph 5.6. the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been

no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven

that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13295

**Person ID** 1270179

**Full Name** Susan Kearney

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly disagree with the proposal of the huge volume of additional housing planned for Dacorum particularly in Berkhamsted and Tring. A large area of valued green belt sites will be lost and the local infrastructure of schools and health facilities will be put under tremendous strain. The additional traffic generated will have a huge impact on air pollution. While I appreciate the need for some much needed housing we do not want our community overwhelmed. I ask in the strongest possible terms for this proposal to be reconsidered.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13310

**Person ID** 1250019

**Full Name** Cllr Nick Hollinghurst

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Plan as a whole. The overall target is completely unfounded – the target should be based on the 2018 ONS Housing Demand Estimates, not the out of date 2014 estimates.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13322
<b>Person ID</b>	1270200
<b>Full Name</b>	Mr Richard Harman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13336

<b>Person ID</b>	1270205
<b>Full Name</b>	Ms Hayley Hobley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I am opposed to the development of the Local Plan, in particular the proposals for South Berkhamsted.</p> <p>It will destroy the beautiful landscape on the towns of Berkhamsted and Tring by building on green belt land which is surrounded by the Chilterns Area of Outstanding Natural Beauty. It will waste and destroy acres of farmland and beautiful countryside.</p> <p>Irreparable harm would be done to the unique character of the historic market towns of Berkhamsted and Tring – which must be preserved for current and future generations. It will put a strain on these communities and overload the local facilities in these areas.</p> <p>The additional transport links will cause serious environmental harm - congestion, noise, air pollution, etc - for all of Dacorum's residents, businesses and visitors.</p> <p>You are planning for too many of the wrong houses in the wrong places. This plan needs to be reassessed. Please reconsider the plan and base it on recent housing data.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13340
<b>Person ID</b>	1144584
<b>Full Name</b>	Mr Gary Ansell
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>1 I understand that DBC must plan for extra dwellings, but I would argue the plan should be re-drawn to take account of new brownfield opportunities that will be now be apparent due to the effects of the pandemic and Brexit. These are two very significant events that will fundamentally affect how many people are living and where and how they are working. For example, many will continue to work from home freeing up office space that could be converted to housing. People more expert than I need to compute the effect of these events on brownfield capacity and complete an up to date brownfield review. The plan then needs to be re-drawn using the up to date data.</p> <p>1 Regarding the Green Belt generally around the borough, the plan includes far too much development in the Green Belt. The NPPF states that only where exceptional circumstances exist can land be removed from the Green Belt. Housing need is not an exceptional I realise that DBC does not have enough non-Green Belt land where the houses could be built, but as a responsible Council, DBC cannot simply put forward a plan that is impossible to fulfil. I understand from attending a full Council meeting earlier this week that the great majority of Councillors, both Conservative and Liberal Democrat do not support the building of the numbers of dwellings included in the plan. So that tells me that this plan does not work and is not fit to go forward.</p> <p>1 I also object to the large extent of building on Green Belt as this goes against the Council's Climate Change Emergency Strategy. How can building on large green field areas support low or zero carbon initiatives, if you are removing the green areas that absorb CO2?</p> <p>1 Another concern I have, which is a wider issue in the DBC area, is the water supply capacity. I understand that this is very near at capacity and 16,000 extra homes will likely lead to water Most of our water comes from the chalk aquifer and this could run dry, endangering the locality's chalk streams which are almost unique in the world. Why does the Local Plan not take this into account? The Local Plan should be protecting important features in our borough, not simply ignoring the consequences of the plan.</p> <p>I hope you will take my comments into consideration. Thank you.</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13342
<b>Person ID</b>	1270207
<b>Full Name</b>	Ms Helena Thorpe Foulsham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <ol style="list-style-type: none"> <li>1 To protect, maintain and enhance biodiversity and geodiversity at all</li> </ol> <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"> <li>1 To protect, maintain and enhance water resources (including water quality and quantity) <ol style="list-style-type: none"> <li>6 Ways to Preserve Biodiversity <ol style="list-style-type: none"> <li>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. ...</li> <li>1 Save the bees! ...maintain the flowers, flora</li> <li>2 Plant local flowers, fruits and ...maintain the source</li> <li>3 Take shorter showers! ...with 16,000 new houses!!!</li> <li>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.</li> <li>5 Know the source! - a clip from the World Health Organization - ".....Threats to biodiversity and health</li> </ol> </li> </ol> </li> </ol> <p>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</p>

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** Spatial Strategy for Growth

**ID** EGS13350

**Person ID** 490211

**Full Name** Ms Barbara Saville

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.

- This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.
- Northchurch has not been recognised at all. It has been called West Berkhamsted instead.
- The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.

There are fears that unique communities with their individual identities such as Northchurch, and the connected hamlet of Dudswell, will simply become part of an enormous, increasingly homogeneous ribbon development from Aylesbury to Watford.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13361

**Person ID** 924129

**Full Name** Mrs Natalia McIntosh

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted and Tring of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13375
<b>Person ID</b>	1270224
<b>Full Name</b>	Ms Heather Wignall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development

rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13388

**Person ID** 1153922

**Full Name** Roger Hyslop

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13403

**Person ID** 1270229

**Full Name** Homes England

**Organisation Details**

**Agent ID** 1270231

**Agent Name** Ms  
Rebecca

Dewey

**Agent Organisation**

Associate Director  
WSP

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth 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 supply<sup>1</sup>. 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%<sup>2</sup>.

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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13410

**Person ID** 1270229

**Full Name** Homes England

**Organisation Details**

**Agent ID** 1270231

**Agent Name** Ms  
Rebecca  
Dewey

**Agent Organisation** Associate Director  
WSP

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

**Spatial Strategy for Growth comment** 35b) Justified - No supporting evidence published to show the reasons for reducing the site ref. Bv02 allocation from 60 to 40 dwellings, despite insufficient housing supply.  
  
3d. At the larger villages’ growth will be apportioned as follows: Bovingdon (240 260 homes), Kings Langley (275 homes) and Markyate (215 homes).

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS13411
<b>Person ID</b>	1270229
<b>Full Name</b>	Homes England
<b>Organisation Details</b>	
<b>Agent ID</b>	1270231
<b>Agent Name</b>	Ms Rebecca Dewey
<b>Agent Organisation</b>	Associate Director WSP
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>changes to the Local Plan</p> <p>3d. At the larger villages' growth will be apportioned as follows: Bovingdon (240 260 homes), Kings Langley (275 homes) and Markyate (215 homes).</p> <p>The amendment of the wording at paragraph 3d supports the retention of site ref. Bv02's housing allocation at 60 dwellings and contributes to the Council's undersupply of housing.</p> <p>Further, in amending the policy wording it will meet the tests of the NPPF, requiring no further evidence to justify the proposed housing figures.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13424
<b>Person ID</b>	1270261
<b>Full Name</b>	MRS SAFFRON MURRAY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. To protect, maintain and enhance water resources (including water quality and quantity)</li> </ol> <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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13433
<b>Person ID</b>	1270263
<b>Full Name</b>	MRS SHARON O'SULLIVAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>This policy fails to take into account the large numbers of people working from home brought about by the pandemic. This number is likely to remain substantial. The policy does not deal with the need to provide dwellings suitable for home working.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13438
<b>Person ID</b>	1270264
<b>Full Name</b>	MRS JANE BROWN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>There is no meaningful account of how the growth of housing on the proposed scale on Green Belt land to the east of Tring can 'be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts' (5.5). There can be no dispute that the proposed expansion will have an unmanageable and hugely significant negative impact on Green Belt, on long rural views and local enjoyment of wildlife in the surrounding AONB to the east of Tring.</p> <p>In policy Sp2 (3c) the proposal claims to provide 'open space facilities'. The building of 2,700 homes on Green Belt with the resulting removal of open space plainly contradicts that claim.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13459
<b>Person ID</b>	1264853
<b>Full Name</b>	Nick Davis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	Yes - developers should be forced to use brownfield sites, rather than our Greenbelt land being destroyed. Councils should be looking to preserve the local environment, and not allow the developers to make maximum profits that Greenbelt development brings.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13465
<b>Person ID</b>	1270266
<b>Full Name</b>	VANDA EMERY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>1) The 'sustainable development strategy' isn't a sustainable development strategy at all, it's a house building strategy or development strategy. A 'sustainable development strategy' is a bit of an oxymorn, as development isn't necessarily sustainable. The level and rate of construction (aka development of the build enviroment) is actually causes a significant proportion of our carbon emissions so is currently incompatable with zero carbon. There is significant evidence that reaching zero carbon requires a significant reduction is the amount of construction activity as it is very difficult to decarbonise steel, concrete, bricks and other building materials.</p> <p>Evidence:  <a href="http://withbotheyesopen.com">http://withbotheyesopen.com</a> <a href="https://ukfires.org/absolute-zero/">https://ukfires.org/absolute-zero/</a></p> <p>What the Borough needs is a "sustainbilty strategy" which sit above all other statregy, and determines the overall direction of travel. Then the "Local Plan" can outline what land use change, retrofit of existing buildings, and new buildings is needed to achieve zero carbon and wider sustainability. Development must be constrained by sustainability, or using the word 'sustainability' is pointless, and misleading.</p> <p>2) It is made abundently clear that the 'sustainable development strategy' is really a 'house building strategy' by the fct that all of the rest of the detail about it is all about building housing. This local plans is so disfunctional and confused as</p>

a set of documents that it isn't in a fit state for the public to consider. How can this country call itself a democracy and this exercise call itself a 'consultation' if the basic step of honestly and clearly communicating what the current proposals are and why they've come about doesn't happen.

3) What is needed is a sustainability strategy which is about how the borough can get to zero carbon, restore and enhance biodiversity, and improve sustainability in terms of material use and pollution. This would then be primarily about retrofitting existing buildings, land use change including changing agricultural practice, planting woodland, restoring habitat, urban green infrastructure...

4) Clearly the government arbitrary house building plans are in the interest of the borough so the borough should be telling them so, and refusing to implement them. Yes there is some housing building needs in the area, but these are mostly little bits of small cheap terraced housing for young people currently priced out of the area, selfbuilt plots for all those who've been on waiting lists for ever and rural workers unable to live near where they work.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13480

**Person ID** 1270268

**Full Name** AMANDA NAISH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

This is a plan I wholly disapprove of as our infrastructure is not able to cope with the vast majority of new housing proposed.

This will have a huge knock on effect to local resources, roads, pollution, potential future flooding and a general overload to our community,

Many people live here because of the green belt, the countryside and the lifestyle that brings, they did not buy into living in a more built up area and to find all the services they rely on overwhelmed.

I would like it noted that I strongly oppose these plans as a local resident, and many thousands of residents would feel the same, but have no idea of these plans as it has not been fairly and widely advertised.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13481
<b>Person ID</b>	1270269
<b>Full Name</b>	WENDY CONIAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I fundamentally disagree with the approach that DBC has taken in drawing up the Draft Local Plan 2020. The Local Plan is clearly not fit for purpose for many reasons but most crucially, in my opinion:</p> <ol style="list-style-type: none"> <li>1. The increased housing numbers are based on flawed and outdated information, which ignores the most recent ONS information and social trends and leads to an unacceptable and irreversible impact on our natural heritage. The Local Plan must be re-drawn based on more recent information and with more respect for the Green Belt, Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC).</li> <li>2. Absolutely critically, this Plan ignores the climate emergency and the Government's Environment Bill and will not deliver legal commitments related to environmental protection and addressing climate change. The Local Plan must define the practical steps necessary to meet the DBC declaration of a climate emergency, and demonstrate how DBC will contribute to the UK's international legal commitments on the reduction of emissions. At present, the Local Plan admits to the options being put forward having a negative impact on climate targets, which is the opposite of what is legally and morally required.</li> </ol> <p>I see in the Plan no coherent strategy intended to benefit residents but a piecemeal approach using land banked greenbelt, led by developers and designed to deliver advantage to those developers. It ignores DBC's own previous position on the release of greenbelt land and the importance of green buffer zones and the integrity and character of distinct settlements.</p> <p>This Plan should be withdrawn and revised using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the strategy. It is vital that new development is planned intelligently.</p> <p>My comments focus on Berkhamsted as that is where I live but many of my objections apply equally to the plan in general and to the specific undermining of rural market towns and communities.</p> <p>I have laid out below my key concerns.</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13500
<b>Person ID</b>	1270278
<b>Full Name</b>	CHRISTOPHER COOK
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The Governments housing policy has lost all touch with planning in the countryside.Houses built in the countryside have an intense local impact. Local people should be granted the right to control the amount, pace and infact the nature of any settlements in their communities, if they are required. Planning rules deny this and infact dictate that local people will loose any say in these matters and therefore allowing free reign to developments.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13509
<b>Person ID</b>	1263874
<b>Full Name</b>	Susan Howe
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Spatial Strategy for Growth comment</b>	<p>To whom it may concern, I wish to register my objection to the plan based on the following:</p> <ul style="list-style-type: none"> <li>1 It will not improve the environment as it is going to take away green space which in turn reduces clean air and the opportunity for residents to benefit from the space. This in turn has the potential to add to mental health costs.</li> <li>1 There will be an increase in car pollution and the current number of electric charging points either in existence or proposed is woeful.</li> <li>1 The housing itself is unlikely to be truly affordable</li> <li>1 There is not enough infrastructure re doctors, dentists that are NHS, etc</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13511
<b>Person ID</b>	1270285
<b>Full Name</b>	MARTIN WELLER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p>

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council’s inner settlement plans and their assessment of housing needs.

**Included files**

**Title**

Spatial Strategy for Growth

<b>ID</b>	EGS13538
<b>Person ID</b>	1260521
<b>Full Name</b>	Steve Ritchie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<b>Spatial Strategy for Growth</b> The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1. The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13561
<b>Person ID</b>	1207724
<b>Full Name</b>	Mrs Gill Broadbent
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	More context should be provided in the plan. The objectives are seemingly arbitrary - and the truth is that they are - imposed on the borough by central government.

The plan does not state the number of existing homes in any of the towns in the borough, it just states the number to be added.

The document should explain where it thinks that population growth will come from, and hence why it requires the projected number of homes; i.e. is the increase from incomers to work in new industry in the area; is it from commuters; from births? Also, by including the profile of the people requiring homes, the plan could then provide detail of the type of homes required too. This breakdown should be used and tracked again to ensure that development is of the correct type.

These figures should be included so that they can be monitored against changes in behaviours and can be amended against plans. The potential changes of work/life patterns as a result of the pandemic should be included.

If the figures cannot be sensibly derived from forecast growth in the area, then the council have a responsibility to push back on central government and their mutant algorithm for calculating the need for house building. This is widely recognised as flawed - ref

<https://www.building.co.uk/comment/the-governments-algorithm-for-homes-may-be-its-next-a-level-st-yle-fiasco/5107924.article> .

Plans should also be presented within the context of plans for other adjacent local authorities to give a clear picture of overall development of the area - and thereby a clear picture on the overall use and dependence on local infrastructure (roads, hospitals etc).

Planned development must include infrastructure (schools, doctors, hospital etc) to be a pre-requisite, not a 'nice to have' following population growth. The council should resist development unless infrastructure is planned for the area.

My view is that the number of homes proposed is very high for a town of this size, and the justification for these numbers should be CLEARLY reported and disseminated to residents as a priority to collect feedback - rather than requesting feedback on this huge and non-specific plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13568

<b>Person ID</b>	1145921
<b>Full Name</b>	Mrs Elinor Stacey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I would like to state my objection to the current Dacorum Local Plan specifically relating to Berkhamsted where I live but in principle my objections will apply to other planned development sites in Dacorum. Whilst I am in agreement with the Dacorum borough council's vision for 'a world with plenty of homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected' the DBC local plan appears only to prioritise housing and excessive numbers at that.</p> <p>My first objection relates the calculation of housing numbers for the Dacorum Local Plan based on an algorithm from 2014 instead of taking into account the latest ONS projected figures for housing need in the Dacorum area. The difference in numbers planned for Dacorum is significantly inflated (992 versus 355 /year). Importantly exceptional circumstances for this over provision of housing need have not been evidenced in the consultation documents presented.</p> <p>Secondly the plan does not appear to have taken into account the Governments' announcement on 16thDecember showing a change in course for affordable housing investment which is now to be focused in major cities (with a 35% uplift), and also prioritises brownfield sites and urban areas. So why does the current Dacorum local plan not reflect this change and still continue to pursue development on greenbelt the impact of which will be irreversible with damaging consequences to the Chilterns Area of Outstanding Natural beauty.</p> <p>As highlighted by CPRE Hertfordshire the proposed strategy by Dacorum Borough Council underestimates regeneration opportunities of brownfield sites resulting from the pandemic due to expected increases in commercial and retail spaces being made available for residential conversion. The strategy also fails to take into account 'windfall' housing completions due to expanded permitted development rights.</p> <p>Thirdly, I am stating my objection Dacorum local plan commits certainty to delivering inflated housing numbers (a 23% increase in Berkhamsted) without fully demonstrating they have fully considered the impact of 2,200 additional households</p>

on the local infrastructure and on the community itself. Berkhamsted's infrastructure is already at capacity in terms of road traffic, schooling, water supply and wastewater as well as healthcare provision. Any mention of these in the local plan appear secondary with none of the guarantees of proportionate uplift infrastructure or on the timing of delivery relative to statements made about housing numbers. This poses a very real risk of developer led builds with poorly planned infrastructure, at best lagging behind or omitted from final developments.

In the local plan there is no employment strategy for Berkhamsted so planned growth will need to support out of town workers. Berkhamsted already has a significant traffic problem that is not sustainable contrary to what is suggested, but not evidenced based by Dacorum Borough Council. Planned building on valley topography on the outskirts of the Berkhamsted away from essential facilities will only augment the current issue for commuters and increase the same bottlenecks even with the proposed changes to the Chesham Road.

Working for a local healthcare provider I am only too aware of the chronic pressures on local healthcare services prior to Covid and also the importance for the health of our communities to have easily accessible local health resources particularly the greenbelt in Dacorum. The pandemic has highlighted how importance the greenbelt has been in maintaining the physical and mental wellbeing of our local community with minimal associated cost to the council. Developing on Berkhamsted greenbelt and rural sites will result in significant loss of our accessible health resource within walking distance for many residents with resultant increased pressures on transport routes and with knock on effects for neighbouring health resources, but most importantly with the real longer term consequences for health outcomes for the communities you serve.

Examples of poor planning in the current plan include 'the provision for older people' to be built on the top of a valley at a distance from Berkhamsted town centre without considering the importance of maintaining the independence of an ageing population, their social inclusion, their accessibility to town facilities + healthcare. The road to access this site (Swing Gate Lane) already struggles with current traffic for the school and existing housing, the neighbouring roads are often rendered inaccessible with only the smallest of levels of snowfall as they are not on main gritting routes, the pavements are not maintained (eroded tarmac and uneven surfaces) and the gradient of the land is a challenge even for the fit and active to walk to and from Berkhamsted centre.

Finally, the local plan has failed to address that we are in a climate emergency and to provide an explicit evidence based plan on how it will reduce local carbon omissions as required by the National Planning Policy Framework 2004 & Compulsory Purchase Act. Building on greenbelt on the outskirts of the small market towns in the Dacorum Local Plan currently does not state any guarantee for carbon zero standards being set for new homes, how it will reduce our dependency on cars, nor does it state how the Council will work with developers and stakeholders to protect existing nature and increase diversity.

Overall, I believe that Dacorum Borough Council should take a step back from the current plan and develop a new intelligent and integrated approach placing climate change, biodiversity, wellbeing and social inclusion at its centre. I absolutely agree that there is a need for more homes but this needs to be the right number of homes (based on accurate projections of housing need), of the right type (social and affordable starter homes) and in the right place (in accessible sites prioritising brownfield and urban areas over greenbelt).

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13585

**Person ID** 1270310

**Full Name** Ms Eleanor Jelf

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open - a sustainable development strategy would protect the Green Belt for future generations. This Local Plan is not sustainable in any meaningful sense.

"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. "National Planning Policy Framework update 24 July 2018

The council has chosen out-of-date data to generate its housing figures. The impact of coronavirus on working patterns and office space have not been considered. Even were housing targets to be revised down, the council has not shown "fully evidenced and justified" exceptional circumstances to release Green Belt land. Nor have "all other reasonable options for meeting its identified need for development" been explored.

Infrastructure is also an important factor in sustainable development. Specifically, Berkhamsted is already feeling the impact of several large developments in recent years, with traffic congestion in the town centre and along Shootersway. The additional 31% increase in housing on the outskirts of Berkhamsted would generate further congestion and pollution – this is the opposite of sustainable development. Other concerns include: water supply (over-extraction is already an identified problem), waste water disposal, oversubscribed schools and increasingly difficult-to-access medical services.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13588

**Person ID** 1270310

**Full Name** Ms Eleanor Jelf

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Green Belt development should not be allowed. The council should not be succumbing to developer-led pressure to secure valuable Green Belt land. Any new developments should show net benefit to the community and the environment. All developments should prioritise affordable low-cost housing and developers should provide environmental impact assessments that demonstrate how they will deliver net benefit to natural habitats, biodiversity and the overall environment.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13601

**Person ID** 1270314

**Full Name** Ms Claire Mistry

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I am writing to submit my response to the Local Plan. I welcome the opportunity to contribute to this consultation and hope that you listen to my response and to that of other respondents, and look forward to seeing the revised Local Plan once all points raised are properly addressed.</p> <p>The Local Plan is clearly not fit for purpose for many reasons, with two being foremost.</p> <ol style="list-style-type: none"> <li>1 The increased housing numbers are based on outdated information, which leads to an unacceptable and irreversible impact on our natural heritage. The Local Plan must be re-drawn based on more recent information and with more respect for the Green Belt, Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC).</li> <li>1 The Local Plan must define the practical steps necessary to meet the DBC declaration of a climate emergency, and lay out how DBC will contribute to the UK meeting our international legal commitments to reducing emissions. At present, the Local Plan admits to the options being put forward having a negative impact on climate targets, which is the opposite of what is legally and morally required.</li> </ol> <p>The revised Local Plan must be based on evidence that is itself subject to public scrutiny. The current plan relies on aspirational growth strategies[1] and has led to a bias in the plans which must be addressed.</p> <p>In addition to the above, there are a number of other key considerations that need to be addressed when the Local Plan is re-drafted.</p> <p>Thank you again for the opportunity to respond to this consultation. I look forward to DBC taking account of all the points raised.</p> <p>Note that more detail on the points above is given on the following pages.</p>

[1] Dacorum Growth & Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan  
 The housing need used as the basis for the Local Plan is fundamentally flawed, being based on 2014 ONS data. This has led to a significant overestimate of the housing need compared with using the most recent 2018 data. In December 2020, the UK government acknowledged that the formula for locating housing development needs to be reformed.

Even given the level of housing being overestimated, the Local Plan fails to take into account the National Planning Policy Framework (paragraph 11, footnote 6) which allows local authorities to restrict the scale of development due to for example Green Belt and AONB planning constraints. Current proposals are against government policy.

Specifically:

- The land between Shootersway in Berkhamsted 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. The revised Local Plan must recognised that a green buffer is needed.
- 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13609

**Person ID** 1270319

**Full Name** Ms Nicola Withers

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	A development like what has been proposed is not sustainable for the local areas infrastructure or ecosystem.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13624
<b>Person ID</b>	1145871
<b>Full Name</b>	Mr Gareth Morris
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p>

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13637
<b>Person ID</b>	1270343
<b>Full Name</b>	KEITH DELDERFIELD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.</p> <p>Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would</p>

have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13655

**Person ID** 1264310

**Full Name** Hayley Golding

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I would like to lodge my objections to the proposed above plans. I believe the levels of expansion are excessive and the loss of green belt land cannot be justified.

In the small towns and semi-rural areas there will be a huge environmental impact with destruction of green belt land and an increase in road traffic.

There does not appear to be any well thought out consideration of where additional schools may be built or when/how these would be funded. Existing a school in smaller towns do not have capacity to service such a surge in population.

There does not appear to be sufficient consideration of play spaces for children or outdoor spaces for exercise.

There does not appear to be sufficient consideration of how or where community amenities would be provided such as shops, community centres, post offices and all the facilities and hubs that make a group of houses a community.

I agree that more houses are needed but I would hope they would be built in a way that adds to communities or creates new communities rather than just decimating green belt land with housing estates.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS13656
<b>Person ID</b>	1270350
<b>Full Name</b>	OSWALD DE SYBEL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	This is to confirm that I endorse the response of CCB to the subject Plan in the reference.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13666
<b>Person ID</b>	1207133
<b>Full Name</b>	Chilterns Conservation Board
<b>Organisation Details</b>	Chilterns Conservation Board
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Concern about the overall aspiration for growth and some development areas.</p> <p>In the context of all of the above, and seeing the draft local plan come together as a whole, we do now have concerns as to whether the scale of growth currently proposed can be made to be consistent with the plan's objectives for the conservation and enhancement of the Chilterns AONB, the Chilterns Beechwoods SAC and the health of the area's chalk streams.</p> <p>We have grave concerns about the potential impacts of some specific development proposals, particularly those that narrow or remove the open buffer between existing built-up areas and the AONB. Indeed, a glance at the draft "proposals</p>

map” reveals that the vast majority of new greenfield development has been located in the setting of the AONB, close to the SACs and/or on the sides of the valleys of the chalk streams. We find this pattern of development unacceptable and consider that it is not consistent with the plan’s objectives, with government policy in the NPPF or with the council’s duty under section 85 of the Countryside and Rights of Way Act 2000.

DBC’s focus on planning to meet its identified housing needs in full will no doubt be welcomed and supported by the Secretary of State for Housing, Communities and Local Government, through a planning inspector’s consideration of the future public examination. The plan clearly intends to deliver on the government’s objective of “significantly boosting the supply of homes” (NPPF, 2019, para 59). However, this objective is only one among a range of national policy objectives that the NPPF seeks, many of which are directly countered by the local plan as currently drafted. As such, we consider that the plan is not currently sound.

Ultimately, it is notable that in the context of DBC’s explicit recognition of the sensitivity of the Borough’s environment (e.g. in sections 2, 3, 17, 18 and 19), as well as the acknowledged global climate emergency and biodiversity crisis, the draft local plan proposes to meet identified development needs in full. This conflicts with the NPPF’s flagship “presumption in favour of sustainable development” policy which requires that development needs should not be met in full (or exceeded) where “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”. Footnote 6 to that policy explains that the said policies that provide the required “strong reason” to restrict development include Green Belts and AONBs (which between them cover almost all of Dacorum Borough), as well as SACs.

The plan’s vision and sustainable development strategy do not make a sufficient case for setting aside the “strong reason” provided by these (and other) policies that protect these (or other) areas or assets of particular importance. It must be emphasised that the onus is on the council to clearly demonstrate why these policies that provide a strong reason to restrict development should be set aside.

Harmful impacts on the AONB and SACs are not discussed in the “vision” and “sustainable development strategy” sections of the draft plan, and the assumption seems to be that these will be resolved or “mitigated” through the area- or site-specific policies and proposals. However, those policies, and the assessments including sustainability appraisal that support them, are predicated on the assumed level of development being a given. The plan assumes that the harm arising from the proposed level of development may be mitigated, when it arguably should have been avoided in the first place by reducing the scale of development proposed, in line with para 11(b) of the NPPF in the context of Green Belt, AONB and habitats policies.

Green Belt as a buffer for the AONB and means of managing development in its setting Nowhere are the shortcomings in this respect of the draft local plan more clear than in the justification (insofar as it is made in the plan itself) for the release of land from the Green Belt.

This is of importance to the CCB because the Green Belt, especially around Tring, Berkhamsted and the north of Hemel Hempstead, fulfils part of its defined purpose of “safeguarding the countryside from encroachment” by providing a permanent and substantial open buffer between built-up areas and the designated AONB, as well as sensitive habitats such as the Chilterns Beechwoods SAC. The Green Belt here also serves as a key means of managing the setting of the AONB as part of protecting its natural beauty and providing space within which that beauty may be enhanced through landscape restoration. Releasing land from the Green Belt in these locations requires rigorous justification, and the

“exceptional circumstances” demonstrated surely must, explicitly, take account of issues regarding the setting of the AONB, as well as impacts arising from those developments on the AONB itself, such as visitor management, air quality and light pollution.

It is not evident from either the local plan or the “Green Belt and Rural Area” topic paper that this matter has been considered properly by the council. The supporting text to the Green Belt policy (SP11) at paragraph 19.6 of the draft local plan refers the reader to the “Sustainable Development Strategy” section for the demonstration that “exceptional circumstances” apply to release land from the Green Belt. That section runs to some 28 pages and contains no obvious rationale for Green Belt

release. The main justification for “exceptional circumstances” to release any land from the Green Belt in the local plan appears to be that there is a need for development that cannot be met elsewhere (either within the Borough or in a neighbouring authority), e.g. at paras 5.3 and 8.20.

It may be inferred from reading this section (and the topic paper) that the over-riding issue, beyond estimates of need and aspirations for growth (which should, under NPPF para 11(b), be outweighed by the policies that provide a “strong reason” for development restraint), is the sustainable “transformation and regeneration of Hemel Hempstead and renewal of its New Town infrastructure” (para 5.3). This is a laudable objective, but is hard to see how this necessarily justifies significant releases of Green Belt at Tring or Berkhamsted. This objective may justify the release of Green Belt land around Hemel Hempstead, but not necessarily to determine that the main focus for development should be in the setting of the AONB: preferable alternatives are available.

NPPF para 11(b) clearly allows for LPAs to plan for less than their identified need where Green Belt and AONB (or other policies) apply, and case law – as ably summarised in the topic paper – implies that there needs to be a combination of circumstances beyond simply a need for development or aspiration for growth, before Green Belt should be released. Such a justification should, in effect, relate to the proper sustainable development of the whole area, rationally considering alternatives, and taking account of the contribution each location makes to the purposes of Green Belt designation: even if exceptional circumstances apply in general, they must be demonstrated for each type of development in each location.

The draft local plan, however, appears to take the view simply that there would be an unmet need for development if no Green Belt land was released, and therefore sufficient Green Belt must be released to meet all identified needs (plus an extra allowance of “safeguarded land” for unspecified future development needs). This is exacerbated by an unfounded assumption in the topic paper (para 8.22) that the Borough is required to meet all of its identified needs for development if there are “no suitable options available for distributing growth to neighbouring authorities” – this is not the correct interpretation of NPPF para 11(b) nor the PPG guidance. The latter states that “If following this [process], needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination” (Paragraph: 025 Reference ID: 3-025-20190722) – the “reasons why” in Dacorum Borough are clearly set out in NPPF para 11(b) and footnote 6. Hence, the plan’s insistence on meeting its identified need in full by releasing land from the Green Belt in the setting of the Chilterns AONB renders the plan as a whole unsound.

This does not mean to say that some development involving release of land from the Green Belt or impacting upon the AONB or its setting could not be justified, but that this must be related to the specific development needs of each policy sub-area in the local plan and to the character of each site and the reasons for its designation. None of this reasoning is apparent in the draft local plan.

The outcome of the draft local plan's flawed approach to its Green Belt releases is that significant greenfield development is proposed adjacent to and elsewhere in the setting of the AONB, including within the zone of influence of the Chilterns Beechwoods SAC. Our particular concerns will be set out in relation to each relevant proposal. A general point, notwithstanding the acceptance of each proposal in principle, is that the draft local plan proposes in each case to release the whole of each identified site from the Green Belt. We would argue that

a) there is often a clear need for a significant landscape buffer on the proposed sites, and we consider that the location and extent of this would better be determined in the local plan and retained as Green Belt (as appears to have been the case for the "safeguarded land" north of Hemel Hempstead – although whether this buffer is sufficient is open to debate), and

b) the principle and extent of some of these proposals are yet to be determined, with regard especially to impacts on the SAC, and we consider that, again, these sites should be retained in the Green Belt pending that determination.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13667

**Person ID** 1145735

**Full Name** Mrs Gwyneth Lee

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I have followed with interest the consultations process on the DBC local plan and would like to submit my comments. As background, my husband and I live in Berkhamsted and provide affordable housing solutions for young professionals in Hemel Hempstead and local areas. We see that many cannot afford good housing and we feel passionately that more should be done to help this sector of the market. In addition, this is a great part of the world to live in and we think that, where possible, any housing solutions should not be at the expense of green spaces which contribute to the beauty of the area and the mental health of its residents.

Our comments are as follows:

- 1 The plan proposes almost 6000 homes in “greenfield growth areas” i.e. Green Belt. This is well in excess (over 100%) of the new homes proposed in the 2013 Core Strategy. And ignores the national Planning Policy contained in the NPPF and statements by Ministers that Green Belt should not be developed except in ‘exceptional circumstances’. We cannot see anywhere what these exceptional circumstances are. In the event that there are none then there must surely be a case for challenging the Central Government requirements for the next 18 years. This is the point of local government after all. There is no way that Central Government can know the local specifics. They have provided a starter figure and it is our responsibility to push back on that in line with the National Guidance. Please can we encourage you to do that.
2. We welcome the commitment for genuinely affordable housing to be included in developments in Berkhamsted and Tring but believe affordable needs to be properly defined in the plan 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.
3. In our opinion, the proposed growth neither respects the environment nor is sustainable. On the environment, the strategy appears to prioritise building on GreenBelt over brownfield and urban development. This is not what the NPPF had in mind. We also question why the bulk of the Hemel Garden Communities allocation has been held back until after the Plan is agreed. There is little in the plan about the protection of existing natural habitats and creation of new ones by rewilding and keeping greenbelt where possible. We would like to see migration corridors that connect the green spaces as far as possible to increase biodiversity. On sustainability... much of the development around Berkhamsted is on slopes or ridges, and part of Tring’s development is in often-flooded locations. Berkhamsted and Tring are identified in the plan to be sustainable locations. These are ‘commuter towns’ where many residents work out of borough. There are insufficient employment opportunities locally in Tring and Berkhamsted to sustain the proposed growth. To ensure future sustainability, there will need to be a significant shift to local employment, there are no proposals in the plan to make the necessary employment space available for a change of this scale. Delivering Great Places Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan. In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.
4. The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in the market towns.. To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. These are commuter towns and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population. In addition, improvements for issues that already exist e.g. Sewage, schools, playgrounds seem non-existent let alone supportive of the new developments. We would like to see these issues addressed head-on rather than assumed as they currently are.

5. We are fully supportive of the Council’s intention to have 40% of new homes on sites of 10 or more homes as “Affordable”. This is a very tough challenge for developments around Berkhamsted and Tring, and we question how the Council’s Strategy arrived at this conclusion. The proposed number of houses to be built should certainly have a primary focus on affordable starter homes. Can this not be achieved by building a higher proportion of houses 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.

In conclusion, I oppose the current plan because:

- a) the total number of new houses proposed in Dacorum is too high as I believe the Government’s numbers have been based on wrong calculations.
- b) The justification for building on Green Belt land is weak and flawed; and
- c) The plan prioritises green belt development over brownfield development.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13669

**Person ID** 1207133

**Full Name** Chilterns Conservation Board

**Organisation Details** Chilterns Conservation Board

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Key Diagram and draft Proposals Map  
 Comment. (p.29 and separate document)  
 The key diagram is very helpful, and we welcome the fact that it shows the plan’s key proposals in the context of the AONB beyond the borough boundaries.

While the key diagram shows the extent of the “Rural Area” this is not shown on the draft proposals map, despite the supporting text of the relevant policy (SP12) saying that it is. See also our comment on that policy below.

It would be helpful, given the emphasis placed on the designation in the early sections of the local plan, for the Chilterns Beechwoods SAC areas to be shown on the key diagram, and possibly the SAC’s zone of influence. Note that the relevant policy (DM31) states that the SACs and the zones of influence are shown on the proposals map, which they are not. See also our comment on that policy below.

We would also support having the borough’s chalk streams identified on the proposals map, which is not currently the case (their representation on the key diagram would be welcome, but perhaps not necessary).

#### Sections 5 & 6 – Spatial Strategy for Growth and Settlement Hierarchy

Object. pp.30-34, policies SP2 & SP3

There is confusion and overlap between these two sections, which amount to the same thing. However, the key problem is that both sections seek to distribute growth across the Borough before the plan has justified the need for and hence appropriate levels of growth.

The first two bullet points under paragraph 5.2 (the “key principles behind the [spatial] strategy”) do not influence the spatial distribution of development, merely the quantum of that development. The quantum of development has yet to be established, and should, from a sustainable development perspective, take account both of opportunities for development and constraints upon it. Instead, the plan simply takes its centrally-derived assessment of local housing need figure of 922 homes per annum (not revealed until p.36) and employment needs assessment (p.44) as read, and these (retrospectively) determine clause 1 of policy SP2.

The CCB strongly objects to the direct translation of the “standard method” figure of 922 homes per annum into the local plan housing requirement for Dacorum, in this case represented in policy SP2(1). The NPPF’s flagship “presumption in favour of sustainable development” policy states that LPAs are not required to meet development needs in full (or exceed them) where “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”. Footnote 6 to that policy explains that the said policies that provide the required “strong reason” to restrict development include Green Belts, AONBs and SACs, all of which apply here. No strategic justification is given for setting aside the “strong reason” provided by these (and other) policies that apply in Dacorum Borough in order that the identified needs for housing and employment land should not be reduced to protect such areas or assets of particular importance.

The remainder of policy SP2 simply sets out the position, already established in the “key principles” (para 5.2), again in para 5.3, then again in paras 5.4-5.7, that most development will be in Hemel Hempstead, with quite a lot of development in Berkhamsted and Tring, a bit in Bovington, Kings Langley and Markyate, with limited development elsewhere. This is all repeated again in para 6.1 and policy SP3.

There is admirable encouragement for the redevelopment of brownfield sites and other forms of redevelopment within the borough’s existing built-up areas, including an emphasis on intensification. This is strongly supported, and to be commended, especially in the context of a new town like Hemel Hempstead – other, lesser, LPAs insist that there is very limited scope for such regeneration in new towns.

However, other than the opportunities for regeneration, there is very little by way of substantive justification for the spatial development strategy or settlement hierarchy, and nothing in the policies or supporting text that indicates that any account has been taken of the specific constraints applying in or around any of the areas or settlements mentioned. This is particularly concerning given that one of the “key principles” ostensibly behind the strategy was “Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites”.

The result is that the spatial strategy requires significant development on greenfield sites in the setting of the Chilterns AONB, closing the open gaps between existing urban areas and the designated AONB, and frequently running up to the boundary itself. As a result, the CCB strongly objects to the spatial strategy (SP2) and settlement hierarchy (SP3) policies.

That the protection and enhancement of the natural beauty of the AONB and its setting has not been considered by the council in shaping the spatial strategy or the settlement hierarchy is evidenced from the fact that the AONB is not specifically discussed in the supporting text to either policy, or mentioned in relation to any of the locations discussed in the policies themselves. The only explicit mention is in the “key principles” (para 5.2), and the subsequent indirect assertion in para 5.5 that landscape impacts will be managed. Managing impacts of a pre-determined quantum of development is a very different proposition than “restricting the overall scale, type or distribution of development” envisaged by NPPF paragraph 11.

It might be argued that the focus of the NPPF is on restricting development only “within” the designated area of an AONB. This is, of course, a major failing of the NPPF as currently drafted. The online planning practice guidance recognises that “Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm” (paragraph: 042: 8-042-20190721) and section 85 of the Countryside and Rights of Way Act 2000 refers to “functions in relation to, or so as to affect, land in” and AONB. Furthermore, in response to the “Glover Review”, the government has now proposed to amend paragraph 172 of the NPPF so that it will read “The scale and extent of development within [National Parks and AONBs] should be limited, while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscapes.” Greater consideration of the setting of the AONB is clearly required in relation to the plan’s spatial strategy.

The CCB considers that the decision to meet the identified development needs in full and locate a significant proportion of the necessary greenfield development required as a result in the setting of the AONB and in already narrow gaps between the main settlements and the AONB boundary represents a failure of the council to fulfil its duty under section 85 of the Countryside and Rights of Way Act 2000 to have regard to protecting and enhancing the natural beauty of the AONB; as a result the plan is not sound.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13691

**Person ID** 1270354

**Full Name** John Parsons

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Almost all ( if not all) of the proposed building sites are on Green Belt Land & one ( the Lock side scheme in Northchurch is an even higher protected area
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13709
<b>Person ID</b>	1263002
<b>Full Name</b>	Rhona Denness
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation</p>

rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13723

**Person ID** 223941

**Full Name** Mrs Cathy Davidson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to play a much greater role in delivering housing growth within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has "delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision. Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined.

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should

be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13724

**Person ID** 223941

**Full Name** Mrs Cathy Davidson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as

set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council 's inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13734
<b>Person ID</b>	223941
<b>Full Name</b>	Mrs Cathy Davidson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>Spatial Strategy for Growth comment</b>	<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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13736
<b>Person ID</b>	1270365
<b>Full Name</b>	Trustees of Gaddesden Estate
<b>Organisation Details</b>	Trustees of Gaddesden Estate (GaddesdenTrust)
<b>Agent ID</b>	1270367
<b>Agent Name</b>	Mr David Fletcher
<b>Agent Organisation</b>	Director – National Development & Planning Strutt and Parker
<b>Yes / No</b>	

\* Yes  
\* No

**Spatial Strategy for Growth comment**

The emerging local plan identifies the vision for development in Dacorum between 2020 to The Emerging Growth Strategy (EGS) seeks to deliver the planned future growth and demands for the borough through the well-established principles of sustainable development which focus on the economic, social and environmental objectives in the NPPF.

In section 5.2 of the ESG, it identifies several key principle considerations to support the delivery of growth, such as:

- Delivering our requirement to significantly boost the housing supply, and in particular, increasing the number of new and genuinely affordable homes in the Borough;
- Seeking out opportunities to maximise the amount of development on previously developed land within existing urban areas but taking this concept much further in Hemel Hempstead by proactively encouraging substantial increases in heights and densities in the most accessible locations;
- Providing growth that will contribute to the transformation and regeneration of Hemel Hempstead and renewal of its New Town infrastructure;
- Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations;
- Providing growth in the villages that reflects their role and character;
- Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites; and
- Ensuring that the preferred strategy is of such a form and scale to deliver the appropriate level and type of infrastructure such as schools, health and transport/movement.

The proposed vision as set out above is broadly supported. However, the proposed housing allocations within the Local Plan, particularly policies HH01 and HH02 do not follow the ESG as identified within the Vision section of the Local Plan.

**Housing Strategy and Over- reliance on large sites and Use of 2014 ONS Data**

Focusing on the spatial strategy for housing growth, the EGS places a significant reliance on large allocations on the outskirts of the main settlements such as Hemel Hempstead with “support” being provided for town and villages to deliver sufficient growth to provide much needed investment.

Policy SP2 (Spatial Strategy for Growth) of the EGS identifies provision for a minimum of 16,596 new homes; no net loss of office floorspace from 2025; a net floorspace increase of 116,500sqm of industrial floor space; additional retail floorspace; and associated infrastructure to support these areas of In order to achieve these ambitious growth provisions/targets, particularly housing and employment, the growth strategy would need to deliver 922 homes per annum over the plan period. The main concentration of new housing and employment space is proposed to be allocated on the outskirts of Hemel Hempstead. Hemel Hempstead will accommodate at least 10,600 new homes, almost 65% of the Borough's total forecast housing supply.

The calculation of 922 dwellings per annum, has been partly used based on Office for National Statistics (ONS) Data from 2014. Accounting for the stage that Dacorum BC are with their Local Plan, it is unclear why the assessment of

housing needs has not been updated to reflect the latest published housing need for Dacorum as published in the 2018 ONS. Whilst it is appreciated that the ONS data needs to be adjusted to reflect market signals, it is important that this assessment is undertaken on the most up to date ONS data, rather than relying on data that is now some 7 years out of date. In this regard, the plan is not considered to comply with paragraph 31 of the NPPF, which sets out a requirement for plans to be underpinned by relevant and up to date evidence. In this regard, it is also important that the Council accounts for the change from office to homeworking as a result of the Covid-19 pandemic. It is considered that this trend is likely to result in a considerably reduced demand for office space within the Borough, meaning that additional brownfield sites are likely to become available for residential development within the key service centres within the Borough.

Paragraph 73 of the NPPF sets out the importance of ensuring the choice and competition for land. It is considered that the provision of 65% of dwellings in and around one settlement, is not likely to provide choice and competition for land. Secondly, it is also considered that this approach is unlikely to meet the objectively assessed housing needs for the Borough as a whole, with an over-provision within Hemel Hempstead and an under-provision within other key towns and villages within. In this regard, this situation is likely to be further exacerbated by the proposed urban extension to the east of Hemel Hempstead, which is within St Albans City & District jurisdiction.

The main proposed housing allocations for Hemel Hempstead are identified as HH01 and HH02. HH01 is North Hemel Hempstead (phase 1) and HH02 is North Hemel Hempstead (phase 2). HH01 is allocated as a New Garden Community, with plans for approximately 1,550 dwellings, a country park, strategic link corridor, a local/neighbourhood centre, and primary and secondary schools. HH02 is a longer term Garden Community allocation, comprising approximately 4,000 dwellings, with associated infrastructure including a strategic link corridor, three local/neighbourhood centres, two primary schools and a secondary school. Both allocations will require large Green Belt releases of land and are wholly within the Green Belt. Whilst HH01 and HH02 are two separate allocations, in reality they are intrinsically linked, particularly in relation to the required infrastructure requirements.

The consideration of a plan's soundness was recently assessed by the Local Plan Inspectors for the St Albans City & District Local Plan which has now been withdrawn. The Inspectors on the St Albans plan raised significant concerns on the soundness of the Local Plan. The Inspectors, amongst other things, raised concerns with the Council's focus of accommodating its housing needs on only strategic sites, particularly given the significant infrastructure requirements relating to larger sites. The Inspectors were particularly concerned that insufficient consideration had been given to the allocation of small to medium sized sites, in order to meet the Council's housing requirements in the short to medium term.

In addition, similar issues were raised in respect of the Uttlesford Local Plan which in 2020 was found unsound, on the basis that it was considered by the Planning Inspector to be highly ambitious and contained three new Garden Communities (Easton Park, North Uttlesford and West of Braintree). The Inspector provided a clear concern regarding the infrastructure required to deliver these settlements and the lack of a robust viability appraisal to demonstrate that the garden settlements were deliverable.

There was a clear recommendation within both of these recent Local Plan decisions of the need to allocate smaller to medium sized sites, as required by paragraph 68 of the NPPF. Small to medium size sites have the ability to deliver housing at a quicker rate due to the smaller infrastructure work/cost, and therefore provide a vital conveyor belt of housing to maintain the supply in the short term.

However, despite the well documented shortcomings of both the St Albans City & District Local Plan and Uttlesford Local Plan, Dacorum appear to be taking a very similar The Dacorum Local Plan is predicated on the delivery of North Hemel Garden Community (5,500 dwellings), Berhamstead Urban Extension (1,870 dwellings) and Tring Urban Extension (2,200 dwellings). Between these three allocations, they will deliver some 9,570 dwellings, which is just over 60% of the total dwellings required over the plan period.

It is considered that this places an over-reliance on a very limited number of strategic sites, and if one or more of these sites were not capable of being delivered, due to the extensive infrastructure costs associated with sites of this size, Dacorum would be in a position whereby they are not able to meet their housing requirements, particularly within the early years of the plan. This approach is considered to be in direct conflict with paragraph 73 of the NPPF.

Therefore, in order to be considered sound, in planning terms, it is considered essential for the housing growth to be more balanced, with a reduced reliance on large strategic sites, with a more dispersed strategy for growth, which seeks to focus housing in a number of smaller and medium sized sites, which are capable of being delivered in the short The plan also needs to be based on the most up to date ONS data.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13743

**Person ID** 1270368

**Full Name** Mr Charlie Laing

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’ s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13755

**Person ID** 1270372

**Full Name** Janet Tuppen

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

**I object to the details of the Emerging Strategy for Growth in the Local Plan on the following grounds:**

**1 The figures used to define the Objectively Assessed Need are out of date.**

- They are based on 2014 ONS statistics. If the revised 2018 figures are used, the number of houses needed per year across the borough is much less. When the 'mutant algorithm' was created, it used the latest 2018 figures, but with many alterations to the standard methodology. Having dropped this algorithm due to political pressure, the 'standard method' has reverted to the 2014 figures. This is inconsistent. If applying the standard method to the 2018 figures, the number would be 355 houses per year, not over 1,000. There is also a difference between need and demand which is not recognised in the calculations.
- **I agree that there is a need for genuinely affordable housing, and we have a generation who feel priced out of the housing market, but we also have a responsibility to look after our natural resources for future generations, therefore Dacorum Borough Council should not be building unnecessarily on 2,000 acres of green belt. This imposed over-provision of housing means that the Local Planning Authority is forced to include in this assessment areas of land which have previously been rejected from previous Local Plans, and the principle characteristics of the towns of Berkhamsted and Tring are being downgraded as unimportant.**

## 1 Lack of response to concerns in the Issues and Options Consultation (held in 2017).

- It is disappointing that little has changed in the Local Plan since concerns were raised by groups consulted at that time. For example, on p.7 *Theme: The protection of ecological assets (green infrastructure, corridors, biodiversity areas, wildlife and chalk streams- water abstraction) should be given great weight and priority in the plan* *Officer Comment: Officers will ensure that the Local Plan protects and enhances the natural environment with particular focus on developing a holistic approach to green and blue infrastructure and climate change. An approach to green infrastructure will be developed and further understanding of the water environment will be developed to inform policies. The Council will also look to develop policies around biodiversity.*

### 2.2 And on the Chilterns SAC:

*Theme: Concern around the impact that development will have on the Chilterns Beechwoods from growth in Dacorum and in adjoining authorities. Officer Comment: The Local Plan will be subject to screening for potential impacts in accordance with legislative requirements. If further assessment of the Plan is required this will be undertaken and any mitigation incorporated into the Plan, as appropriate. Consideration will also be given to proposed development in adjoining authorities. The Council will work with adjoining authorities through the duty to cooperate to identify potential impacts on protected sites.*

- **There is insufficient detail in the latest consultation to demonstrate how the natural environment will be protected. There are no robust biodiversity policies, and the HRA has not yet been completed or issued.**

## 1 The strategy prioritises economic growth at the expense of the environment.

- DBC has not completed the legally required Habitats Regulations Assessment (HRA) before publishing this part of the Local Plan. If the environment was a priority the HRA would have formed an integral part of the decision making process.

## 1 The growth strategy does not take into account current economic uncertainty following Covid 19. The Local Plan takes a long time to prepare over several years, and a lot of budget. However, one should not continue on the same path simply because of the effort that has already been expended. The plan needs to be reassessed.

- The UK went into recession in the first half of 2020, and GDP fell by 9.9% across the year. Once the various fiscal support measures come to an end at the end of March (Help to Buy, the furlough scheme and the temporary stamp duty holiday) there is a grave risk of further instability. In November 2020 the Office for Budget Responsibility issued a gloomy prognosis suggesting unemployment was likely to double after furlough is withdrawn, and predicting that house prices will fall 8% by the end of next year. This could also result in more house repossessions if customers can't maintain their mortgages, and landlords removing tenants who are struggling to pay their rent.

- A survey of developers released in December 2020 found that 47%, were pessimistic about the next 12 months.
- **The Local Plan in its current form needs revising to take into account the current economic situation, with Covid 19 having a dampening effect on the economy.**

<https://www.building.co.uk/focus/residential-market-survey-housebuilders-hopes-and-fears-for-2021/5109449.article>

#### Included files

**Title** Spatial Strategy for Growth

**ID** EGS13802

**Person ID** 1163978

**Full Name** John Wignall

#### Organisation Details

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

#### **Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

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The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council 's inner settlement plans and their assessment of housing needs.

**Included files**

**Title**

Spatial Strategy for Growth

<b>ID</b>	EGS13813
<b>Person ID</b>	1270385
<b>Full Name</b>	Ms Katy Regan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>The Local Plan contains very little about sustaining villages, and does not address ensuring that our villages are self-sustaining communities, rather than car dependent dormitory settlements.</p> <p>The plan does not address the Glover Review which proposes to make the AoNB into the Chilterns National Park. Some sites proposed will actively damage the AoNB.</p> <p>There has not been a full consideration of employment in the borough, particularly in light of recent changes, such as reduced office use, which may well reduce commuting.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13822
<b>Person ID</b>	1265375
<b>Full Name</b>	LANYING BURLEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Dacorum's local plan

I am writing to object to the proposed development. I am very concerned about the development plan that has been published and the impact it would have on the parish of Great Gaddesden.

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 can not easily take a stand or get together to voice their opinions.

The proposed development covers almost 18% of the parish and reaches right to the border of the (Area of Natural Beauty) AONB demarcation line. The increase of sound and light pollution will significantly damage the natural beauty of the AONB. Chiltern's area of outstanding natural beauty should not be made vulnerable to this so called 'vision'.

The area is already suffering badly from the creeping urbanisation as littering and fly tipping and traffic have become major problems. Increasing the number of housing, people and traffic will only make the situation worse. The roads and country lanes are not fit to cope with increased traffic and will only lead to more congestion and more accidents on the narrower lanes where there are many cyclists and walkers.

I appreciate that developers are pushing hard but we need to push back even harder and not permit this plan.

We do not need all this housing. I appreciate that Dacorum has fought hard to have the original number lowered and had expected the original number of 922 to be reduced when the algorithm was cancelled but it has actually been increased by the Ministry of Housing and Local Government to an even more unreasonable figure despite clear evidence that the need is actually likely to be substantially lower.

It is vital that the fight to correct this continues and secures a permanent resolution to help protect this parish and this county from irrevocable harm.

The plan talks about 'developing the transport proposals' but currently the area that this plan encompasses does not have any existing infrastructure and can only result in more road traffic on already overcrowded roads. The proposed link road with Junction 8 will compound the environmental issues and cause significant further environmental and real harm to the surroundings.

I strongly object to the proposals and urge Dacorum to continue to resist inappropriate targets, to continue to fight for fairer ones and make clear the problems and issues which this plan will create.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13832

**Person ID** 777073

<b>Full Name</b>	Mrs Anne Lyne
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>There is little in the way of planning for the social and cultural development of the Borough. There is a stated aspiration to create a vibrant town centre, but since the role of the town centre is changing both pre- and post-Covid, how will people be attracted to Hemel Town Centre if there is no cultural venue? It is already obvious that retail habits have changed.</p> <p>Policy SP6: I totally disagree that development on the former Market Square in Hemel should be retail-led. It should include retail, but it is the most suitable site for a cultural/public entertainment/performance space, which would make the town centre a much more attractive proposition</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13845
<b>Person ID</b>	1270387
<b>Full Name</b>	Mr Richard Pilkinton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Again the Dacorum Local Plan needs to address sustainability throughout the Borough including the specific circumstances of each Community.</p> <p>I am using Markyate as an example, but the plan needs to be sustainable for each community in a similar way.</p>

Access to services and employment are limited so any increase in the number of houses planned for development in Markyate is not sustainable.

Historically Markyate has always been an industrial village moving from businesses that served the coaching days to those serving the nearby Vauxhall and London Luton airport ancillary businesses. It has had a full range of shops and service businesses too, although there are fewer than in the past. The Dacorum Local Plan fails to acknowledge this and does not show any commitment to the sustaining of our community.

The area is lacking in rainfall; the water supply for Markyate comes from Grafham Water; the River Ver has been over-abstracted and only flows sporadically. Our local sewage works struggles to cope with the existing households waste. We are still subject to more power cuts than many area as our power is taken from the National Grid pylons which cross the village, internet connections can be unreliable – high speed connections are promised but are not yet fully met. I do not think the Dacorum Local Plan addresses the sustainability of Markyate as it is now, let alone providing for any new housing.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13860

**Person ID** 611689

**Full Name** Mrs Sheila Pilkinton

**Organisation Details** Markyate Parish Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Again the Dacorum Local Plan needs to address sustainability throughout the Borough including the specific circumstances of each Community.

I am using Markyate as an example, but the plan needs to be sustainable for each community in a similar way.

Access to services and employment are limited so any increase in the number of houses planned for development in Markyate is not sustainable.

Historically Markyate has always been an industrial village moving from businesses that served the coaching days to those serving the nearby Vauxhall and London Luton airport ancillary businesses. It has had a full range of shops and service businesses too, although there are fewer than in the past. The Dacorum Local Plan fails to acknowledge this and does not show any commitment to the sustaining of our community.

The area is lacking in rainfall; the water supply for Markyate comes from Grafham Water; the River Ver has been over-abstracted and only flows sporadically. Our local sewage works struggles to cope with the existing households waste. We are still subject to more power cuts than many area as our power is taken from the National Grid pylons which cross the village, internet connections can be unreliable – high speed connections are promised but are not yet fully met. I do not think the Dacorum Local Plan addresses the sustainability of Markyate as it is now, let alone providing for any new housing.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13875

**Person ID** 1270388

**Full Name** Mr & Mrs David & Emma Robertson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development

rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13887

**Person ID** 1264756

**Full Name** Kathryn Salway

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Spatial Strategy for Growth

The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1.

The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13911

**Person ID** 1207810

**Full Name** Louisa Groves

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Spatial Strategy for Growth comment</b>	Very little consideration has been put into the environmental impact your proposal will have. As previously mentioned, the chalk beds are already drying up - focus should be put on this issue rather than building more houses to make it worse. The chalk streams provide habitat for some of Britain's rarest species yet Dacorum Borough Council are prepared to sacrifice this to meet government targets instead of saying no! The proposal to build on Green Belt land is insulting. We live in an area of outstanding natural beauty and as soon as you start giving permission to build on such precious land, you open the flood gates to ruin the area in which we live. Green Belt land should only be released in exceptional circumstances - you can meet the required growth need, you just can't meet the growth demand put on you by the government! People live here because it is beautiful! It is good for people's mental health. With regard to the environment, you have not considered sustainability at all - adding a couple of cycle lanes and declaring that this is your vision for a sustainable environment is so short sighted when you are destroying habitats and causing other environmental issues by building too many houses!
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13922
<b>Person ID</b>	1270392
<b>Full Name</b>	Ms Anna Skingley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development

rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13934

**Person ID** 1145435

**Full Name** Mr Paul Crosland

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Local Plan envisages the re-classification of 850 hectares of Green Belt land around the Borough to allow for additional housebuilding. This proposal is quite monstrous and unjustified, and will damage the nature of the Borough irreversibly.

Policy SP2 – Spatial Strategy for Growth – proposes a minimum of 16,596 new dwellings – 922 per annum, over the period of the Plan. Central Government undertook a review of the algorithm that determines housing need to ensure consistency with its stated objective of re-balancing growth between southern Britain and the north. In the case of Dacorum, the new figure for housing need following the Government's review, has actually *increased* to 1,023 per annum.

Adopted less than ten years ago, the Core Strategy for Dacorum covering 2013 to 2036 identified a figure for housing growth of 430 per annum – less than half of the growth rate in the current Local Plan. How can the residents of Dacorum have any faith in the housing growth figures they are being consulted on when they are so widely at variance with growth targets established previously? In addition, Dacorum appears to be unwilling to challenge Central Government's housing need numbers on the basis of 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 Areas of Outstanding Natural Beauty.

The prospective high build rate will adversely impact the principal urban centres in the Borough and lead to the unwarranted loss of swathes of Green Belt, including the northern edge of Hemel Hempstead, around Berkhamsted/ Northchurch and Tring, that are designated in the Draft Local Plan as 'Growth Areas'.

With specific reference to Berkhamsted and Northchurch (now apparently re-named “West Berkhamsted” in the Local Plan) 2,200 dwellings are planned [Policy SP2- item 3b] of which around 500 are in Northchurch parish and 1,700 are planned for Berkhamsted. This equates to a substantial 24% increase in the number of dwellings in Berkhamsted/Northchurch over the 18 year period of the Local Plan. The majority of the proposed sites for these new dwellings are currently in the Green Belt at some distance (3 – 4 km) from the town centre and station, at the top of steep valley sides. I question how new developments at this distance (and difference in elevation) from town centre infrastructure can be considered as “sustainable” when so many additional transport trips will inevitably be generated.

The Local Plan at least recognises in Para 23.119 [Page 225] that Berkhamsted currently experiences high level of congestion. It also acknowledges that there are a very limited number of solutions to alleviate this congestion (“*there are few opportunities for new road capacity in the town*”). Increasing congestion will inevitably hamper economic growth, which will itself have a negative impact on the town, leading to a spiral of decline. At the very least it will detrimentally affect the lives of the existing residents of Berkhamsted, and thereby runs counter to the policy aims of the draft Local Plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13935

**Person ID** 1145435

**Full Name** Mr Paul Crosland

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Noting the content of paragraphs 5.3 to 5.5 of the Local Plan, the following comments are made in the context that the overall numbers for housing need are not properly evidenced.

The stated intention within the Draft Local Plan to ‘grow’ Hemel Hempstead by “much greater urban intensification” is of concern since, by definition, “intensification” means that buildings will have to increase in height, many more people will be subjected to ‘high rise living’ in more cramped accommodation, with less green space around them – to the detriment of their health and well-being.

In Berkhamsted and Northchurch, and also in Tring, the statement that Dacorum “will not pursue an urban intensification strategy that detracts from the character of these locations” is to be welcomed. However, given the distance at which new housing is proposed from the centre of those towns, it difficult to understand how these can be seen as “*sustainably located close to passenger transport and other services, facilities and employment opportunities*”.

Item 3b in Policy SP2 makes the statement “*Berkhamsted will accommodate at least 2,200 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities*”. This statement is purely an aspiration, it offers no evidence as to how, where or why the additional housing provision will provide the enhancements and new initiatives stated.

With regard to sustainability of employment, the Local Plan does not offer any commitment to improving or extending local employment opportunities within or close to Berkhamsted. I take this to mean that either Dacorum Borough Council envisages Berkhamsted becoming a ‘dormitory’ town for people working elsewhere, or that more people are assumed to be ‘working from home’ in the future.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13948

**Person ID** 1145435

**Full Name** Mr Paul Crosland

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I have noted references throughout the Draft Local Plan that reinforce the strategy behind the distribution of housing allocations in the manner set out. This will result in very substantial additions to both the major settlements of Berkhamsted and Tring with extensive new releases of Green Belt to be designated as ‘growth areas’, with all the implications this has for assumed outline planning permission when it come to developing those sites. However, in the case of both Berkhamsted/ Northchurch or Tring, growth will be neither organic nor ‘sustainable’ – as local employment opportunities at the scale to match resident numbers does not exist and will lead to additional out-commuting.

In my opinion, it would be better to locate new dwellings at scale closer to centres of industry and hence employment. For Dacorum, industry is concentrated in Maylands and the surrounding area.

Noting the proposals for Hemel Hempstead Garden Communities – the land released for Growth Area HH01 ( Phase 1) to be undertaken 2021 -2038 and the Growth Area HH02 (North Hemel - Phase 2) recorded as being released from Green Belt on adoption of *this* Local Plan but safeguarded for development in the next LP period, 2038 – 2050: this area is designated for around 4,000 homes etc.

I am unconvinced that Berkhamsted and Tring should be developed to the extent proposed for 2021-2038: the capacity to absorb the growth of over 24% and 50% respectively in these towns and hence use of the term ‘sustainable development’ is at best questionable in this case. Appending HH01 and HH02 to the existing urban network is likely to prove to be the more ‘sustainable’ solution.

I therefore request the Borough to:

- 1 Reconsider the allocations [which in any case I dispute as being justified - see my response to **Question 7**], and defer the release of BK01 from the 2021 – 2038 plan
- 1 Re phase the implementation of HH02 to bring forward to 2021 – This would bring forward some 4,000 homes which will be better located for employment opportunities within the Borough.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13950

**Person ID** 1145435

**Full Name** Mr Paul Crosland

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I have noted the content of the Topic Paper entitled ‘Development Strategy November 2020’ which describes the history, marshals the data and argues that the dwelling numbers for the Regulation 18 Plan meets the housing needs for the Borough viz 922, or more recently revised to 1,023, dwellings per annum. I dispute that this is the correct method of assessing local “need” as it based on national rather than local criteria and requirements.

The paper includes a comment:

(see attchement)

The following data is drawn from reliable sources i.e. the Office for National Statistics (ONS) and the study commissioned by the 'Districts' Joint Housing Needs Assessment' quoted in the Draft Local Plan.

The current dwelling numbers established in the Adopted 2013 Core Strategy sets an annual build rate of 430 dwellings per annum (dpa).

The Data shown in Figure 2 Housing Trajectory 2020 – 2038 on page 38 records anticipated completions across the Borough for 2020/21 as **654** and 21/22 as **1,036** . 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 central Government (Ministry of Housing, Communities & Local Government) to determine the 'national requirements' :

#### **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

I object to the adoption by the Borough of the Ministry's numbers which have no credible foundation. 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**

[EGS13950.docx](#)

**Title**

Spatial Strategy for Growth

**ID**

EGS13955

**Person ID**

1270381

**Full Name**

Alexandra Das-Crosland

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Local Plan envisages the re-classification of 850 hectares of Green Belt land around the Borough to allow for additional housebuilding. This proposal is quite monstrous and unjustified, and will damage the nature of the Borough irreversibly.

Policy SP2 – Spatial Strategy for Growth – proposes a minimum of 16,596 new dwellings – 922 per annum, over the period of the Plan. Central Government undertook a review of the algorithm that determines housing need to ensure consistency with its stated objective of re-balancing growth between southern Britain and the north. In the case of Dacorum, the new figure for housing need following the Government's review, has actually *increased* to 1,023 per annum.

Adopted less than ten years ago, the Core Strategy for Dacorum covering 2013 to 2036 identified a figure for housing growth of 430 per annum – less than half of the growth rate in the current Local Plan. How can the residents of Dacorum have any faith in the housing growth figures they are being consulted on when they are so widely at variance with growth targets established previously ? In addition, Dacorum appears to be unwilling to challenge Central Government's housing need numbers on the basis of 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 Areas of Outstanding Natural Beauty.

The prospective high build rate will adversely impact the principal urban centres in the Borough and lead to the unwarranted loss of swathes of Green Belt, including the northern edge of Hemel Hempstead, around Berkhamsted/ Northchurch and Tring, that are designated in the Draft Local Plan as ‘Growth Areas’.

With specific reference to Berkhamsted and Northchurch (now apparently re- named “West Berkhamsted” in the Local Plan) 2,200 dwellings are planned [Policy SP2- item 3b] of which around 500 are in Northchurch parish and 1,700 are planned for Berkhamsted. This equates to a substantial 24% increase in the number of dwellings in Berkhamsted/Northchurch over the 18 year period of the Local Plan. The majority of the proposed sites for these new dwellings are currently in the Green Belt at some distance (3 – 4 km) from the town centre and station, at the top of steep valley sides. I question how new developments at this distance (and difference in elevation) from town centre infrastructure can be considered as “sustainable” when so many additional transport trips will inevitably be generated.

The Local Plan at least recognises in Para 23.119 [Page 225] that Berkhamsted currently experiences high level of congestion. It also acknowledges that there are a very limited number of solutions to alleviate this congestion (“*there are few opportunities for new road capacity in the town*”). Increasing congestion with inevitably hamper economic growth, which will itself have a negative impact on the town, leading to a spiral of decline. At the very least it will detrimentally affect the lives of the existing residents of Berkhamsted, and thereby runs counter to the policy aims of the draft Local Plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13956

**Person ID** 1270381

**Full Name** Alexandra Das-Crosland

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Noting the content of paragraphs 5.3 to 5.5 of the Local Plan, the following comments are made in the context that the overall numbers for housing need are not properly evidenced.

The stated intention within the Draft Local Plan to ‘grow’ Hemel Hempstead by “much greater urban intensification” is of concern since, by definition, “intensification” means that buildings will have to increase in height, many more people will be subjected to ‘high rise living’ in more cramped accommodation, with less green space around them – to the detriment of their health and well-being.

In Berkhamsted and Northchurch, and also in Tring, the statement that Dacorum “will not pursue an urban intensification strategy that detracts from the character of these locations” is to be welcomed. However, given the distance at which new housing is proposed from the centre of those towns, it difficult to understand how these can be seen as “*sustainably located close to passenger transport and other services, facilities and employment opportunities*”.

Item 3b in Policy SP2 makes the statement “*Berkhamsted will accommodate at least 2,200 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities*”. This statement is purely an aspiration, it offers no evidence as to how, where or why the additional housing provision will provide the enhancements and new initiatives stated.

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS13968

**Person ID** 1270381

**Full Name** Alexandra Das-Crosland

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I have noted references throughout the Draft Local Plan that reinforce the strategy behind the distribution of housing allocations in the manner set out. This will result in very substantial additions to both the major settlements of Berkhamsted

and Tring with extensive new releases of Green Belt to be designated as 'growth areas', with all the implications this has for assumed outline planning permission when it come to developing those sites. However, in the case of both Berkhamsted/ Northchurch or Tring, growth will be neither organic nor 'sustainable' – as local employment opportunities at the scale to match resident numbers does not exist and will lead to additional out-commuting.

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I therefore request the Borough to:

- 1 Reconsider the allocations [which in any case I dispute as being justified - see my response to **Question 7**], and defer the release of BK01 from the 2021 – 2038 plan
- 1 Re phase the implementation of HH02 to bring forward to 2021 – This would bring forward some 4,000 homes which will be better located for employment opportunities within the Borough.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS13970
<b>Person ID</b>	1270381
<b>Full Name</b>	Alexandra Das-Crosland
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* <b>Yes</b>	
* <b>No</b>	

**Spatial Strategy for  
Growth comment**

I have noted the content of the Topic Paper entitled 'Development Strategy November 2020' which describes the history, marshals the data and argues that the dwelling numbers for the Regulation 18 Plan meets the housing needs for the Borough viz 922, or more recently revised to 1,023, dwellings per annum. I dispute that this is the correct method of assessing local "need" as it based on national rather than local criteria and requirements.

The paper includes a comment:

(see attchement)

The following data is drawn from reliable sources i.e. the Office for National Statistics (ONS) and the study commissioned by the 'Districts' Joint Housing Needs Assessment' quoted in the Draft Local Plan.

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The Data shown in Figure 2 Housing Trajectory 2020 – 2038 on page 38 records anticipated completions across the Borough for 2020/21 as **654** and 21/22 as **1,036** . 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 central Government (Ministry of Housing, Communities & Local Government) to determine the 'national requirements' :

**Dacorum**

**ONS projection of Dacorum annual**

**housing growth**

**After adjustment by MHCLG algorithm**

**After adjustment by MHCLG algorithm**

ONS 2014

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1023

new standard applied

ONS 2018

355

922 [mutant applied]  
497  
new standard applied

I object to the adoption by the Borough of the Ministry's numbers which have no credible foundation. 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**

[EGS13950.docx](#)

**Title**

Spatial Strategy for Growth

**ID**

EGS13989

**Person ID**

1270412

**Full Name**

James Mullins

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

**Included files**

**Title**

Spatial Strategy for Growth

**ID**

EGS14011

**Person ID**

1146072

<b>Full Name</b>	Helen Cole
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>At the top level this plan was devised before the recent government changes to planning guidance and does not seem to have been amended as a result. As part of the 'levelling up agenda' we should be looking at developing more places to live and work in the North of the country rather than further developing the already overcrowded South East. The numbers of houses required do not seem to have been adjusted to reflect this. Secondly it does not take into account changes in lifestyles as a result of the pandemic. It is very likely that more people will be spending at least part of the week working from home in the future, rather than commuting every day, and therefore proposed housing density should be reduced to allow people the space they need. We know that people value garden space more now than in the past, and yet this plan agrees to an increase in permitted housing density. This will result in developers building houses that do not properly meet people's needs. I cannot see how adding to existing towns without improving roads achieves the objective of reducing congestion, (which is already a problem, as acknowledged in the plan), and can only make this worse. Whilst providing employment sites in the borough is admirable, it is highly unlikely that this will reduce congestion, those jobs are just as likely to go to someone who lives outside the borough and needs to commute.</p> <p>We know we are facing a climate crisis, in the UK we have committed to net zero by 2030, and yet there is nothing that I can see in this plan that says that all new housing must meet standards to support this. As a minimum we must have infrastructure to support our climate change goals. Houses must be built to the highest 'green standards' we must have a commitment that no natural gas supplies are provided to these homes, that each has a heat pump and solar panels. Every home should have an electric charging point. This should all be explicitly described in the plan. Cycle lanes to the town centre and station should be provided which are safe and well away from traffic.</p> <p>I note that the plans propose significant building on green belt. The statements say that this can only be done in 'exceptional circumstances;' but that these exceptional circumstances have been established. I cannot see any detail on how these have been established. If green belt is to be built on I would argue that it would make much more sense to build a new town or towns to meet any future housing needs. That way the development is planned properly with all the amenities required for modern living, rather than bolting on to an existing one which was never designed to be so large. This ensures that roads, cycle lanes, train stations, parking and open spaces are adequate by design, that schools are</p>

available providing enough places and doctors surgeries are adequate. In bolting on to an existing town there is inevitable loss of amenity for existing residents as more pressure is put on roads, schools and healthcare and the additional pressure is often not adequately considered .

I do not agree that it is possible to maximise urban capacity in Tring with the number of proposed houses at increased housing density without resulting in an urban intensification strategy that detracts from the character of these locations. This is totally contradictory

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14026

**Person ID**

**Full Name**

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Further analysis and work is needed on the needs of the community as it expands. Patterns of work will be different, which will alter the London commuter balance (see Question 3).

Retail space may be needed in different ways. It is likely that further land in and around town centres will be available on a change of use basis. There is no evidence of this thinking in the Plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14032

**Person ID** 1270428

**Full Name** KIERAN HOLLAND

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14045
<b>Person ID</b>	1264962
<b>Full Name</b>	Courtney Culverhouse

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Spatial Strategy for Growth 40% minimum affordable homes objective to be enforced across the Borough.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14062
<b>Person ID</b>	1270476
<b>Full Name</b>	ALISON CHESHIRE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Yes. I'm deeply concerned that our beautiful, friendly and thriving village of Northchurch hasn't been acknowledged. Instead it's been renamed 'West Berkhamsted'. It fails to recognise the cultural and historical importance of our village.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14075
<b>Person ID</b>	1270478
<b>Full Name</b>	HANSEN L & H

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The housing number DBC are proposing will lead to a growth strategy in unsustainable locations on Green Belt. The way in which the housing numbers have been calculated is wrong. The Government has clearly stated that the numbers are not targets and that the new houses should only be built on Green Belt in exceptional circumstances. These exceptional circumstances do not exist. The housing numbers should be adjusted according to the constraints of the towns like Tring and Berkhamsted. Most of the proposed sites in Berkhamsted are several kilometres away from the town centre and train station and on a valley side with very steep gradients. The transport infrastructure can not sustain the volume of proposed housing.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14105
<b>Person ID</b>	1270501
<b>Full Name</b>	DAVID WHITE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Dacorum's Strategy is based out-of-date projections that do not reflect a true picture of housing demand. Since the projections were made in 2014, significant social and economic changes have reduced the need for dwellings in Dacorum. The 2014 Household Projections: England, 2014-2039 Report acknowledges, on page 2, that their projections cannot predict changing circumstances:

“The assumptions underlying national household and population projections are based on demographic trends. They are not forecasts as, for example, they do not attempt to predict the impact of future Government policies, changing economic circumstances or other factors that might influence household growth.”

The Government acknowledges that circumstances have changed since 2014 when these projections were made. The recent Government response to the local housing need proposals states:

“Since we published the consultation, the way that the country lives, works and travels continues to change more rapidly than at any time since the war.”

In 2014 people needed to live near London to commute to work. This has changed. Even before Covid, surveys repeatedly showed that most employees want to work from home at least some of the time and over a third would take a pay cut in exchange. The experience of working at home, during Covid, has given workers and managers a taste of what could be. according to a report.

According to ‘The future of towns and cities post-Covid-19 report’ in January 2021 by the auditing firm KPMG, a permanent shift towards working from home and increased online shopping could cost more than 400,000 retail jobs on England’s high and vacant retail space. Microsoft, Facebook and Twitter have told staff that they will have the option of working from home permanently. On 23 February 2021, HSBC announced its intention to reduce its office space by nearly 40% to capitalise on new part-office-part-homeworking arrangements after the pandemic. As Global Workplace Analytics concludes: “The genie is out of the bottle and it’s not likely to go back in.”

<https://globalworkplaceanalytics.com/work-at-home-after-covid-19-our-forecast>

So, the 2014 projections are out-of-date and far too high. Even by 2016, the Office for National Statistics (ONS) were projecting far less demand for housing in Dacorum. By 2018 their projections had more than halved.

Dacorum’s Sustainable Development Strategy does not comply with the duty to protect the Green Belt under the National Planning Policy Framework (NPPF). It seeks only to protect the Chilterns AONB:

Policy DM27 - “Landscape Character and Chilterns Area of Outstanding Natural Beauty 1. All development shall help conserve, restore or enhance the prevailing quality, character and condition of Dacorum’s natural and historic landscape. 2. Permission for major developments in the Chilterns Area of Outstanding Natural Beauty (AONB) will be refused unless exceptional circumstances prevail as defined by national planning policy”.

Dacorum’s strategy fails to offer the same protection to the Green Belt. The paragraphs dealing with the Green Belt are concerned only with an intention to build on it:

19.7: “We have undertaken a review of the Green Belt and identified those areas on the edge of the main settlements where exceptional circumstances exist to release land for development or where other minor adjustments are necessary”.

“These proposed releases will make a significant contribution to meeting the long term housing and other development needs of the Borough. Green Belt land has been released to enable the delivery of the spatial strategy for Dacorum.”

In contrast, Dacorum's previous strategy (2017) contained principles to protect the Green Belt:

10.2.2 "These cover the need to make the best use of brownfield land to maximise opportunities for urban regeneration".

"National planning policy is also clear that Green Belt boundaries should only be changed in exceptional circumstances. The protection of the Green Belt from inappropriate development is an important national and local principle".

10.2.3 "Another important principle is to ensure that our urban areas do not sprawl into other existing settlements undermining their distinct and separate identities. Likewise, isolated development which has poor connections with local services and facilities should be discouraged. Protecting the character of our town and villages, and that of important landscapes and countryside will also be important considerations, as will using development to help fund and deliver essential new infrastructure".

In Dacorum's new strategy, the "exceptional circumstances" required by the NPPF to build houses on Green Belt seem to consist of little more than, "because we want to build houses".

The Bulbourne is a rare chalk stream: there are only 250 in the world and most are endangered. The river is a sanctuary for all kinds of wildlife and a source of biodiversity. Hertfordshire's State of Nature report 2019 by the Herts & Middx Wildlife Trust explains the importance of the River Bulbourne:

"Hertfordshire has a national and international responsibility for protecting its special chalk rivers, which have a unique ecology due to their clean, mineral-rich water and consistent flows. A high proportion of the world's global numbers of chalk streams can be found in the South-East of England, specifically in Hertfordshire".

The Bulbourne rises at Dudswell, and runs for 10km alongside the Grand Union Canal through Northchurch and Berkhamsted and joins the Gade at Two Waters, Hemel Hempstead. The Bourne Gutter, a winterbourne, periodically rises and joins it at Bourne End.

Chalk streams are beautiful, flowing crystal-clear over a gravel bed and supporting rich ecologies. Rainfall enters the river basin, works through the chalk strata and emerges via springs as crystal clear water. As this process takes months, the river level rises and falls slowly. However, abstractions for public water supply and for the canal have seriously depleted the quantity and quality of water in the Bulbourne. The Environment Agency recently concluded that unsustainable levels of abstraction for public water supply are contributing to low flows:

<https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039029890>

<http://dacenvforum.org.uk/wp-content/uploads/2019/03/DEF-EA-Presentation-21-Feb-2019.pdf>

The wetland features of the River Bulbourne are fragile and threatened by groundwater abstraction for domestic water. Houses in Northchurch, supplied with water pumped from the chalk aquifer, reduce the water available for the river. To avoid further abstraction from the chalk aquifer and further damage to the River Bulbourne, the proposed developments in Northchurch would require a new reservoir and water imported from other areas. These massive and expensive

infrastructure projects would not only take years but would also require additional land which Dacorum's Strategy has not identified.

The proposed new developments will also damage the quality of the water. Impermeable surfaces, such as roads, paths and roofs and carparks, mean that rainwater, rather than seeping through chalk, runs into drains which flow directly into the river causing it to rise and fall rapidly. Silt, rubbish, chemicals and effluent turn the river into a thick layer of dark, polluted silt and cause localised flash flooding.

Dacorum's Strategy has not considered the negative impact of water supply on the River Bulbourne. The proposed developments will cause irreversible harm to the quantity and quality of the water and its fragile wetland ecology.

### 2.3 Dacorum is not obliged to meet these 2014 figures

The Government has made it clear that Councils are not compelled to meet these 2014 figures at the expense of their legal duty to protect the Green Belt and the environment:

"We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places."

Dacorum's strategy conflicts with Government policy because it causes unacceptable harm to the Green Belt and to the River Bulbourne. It is, therefore, flawed and should be revised to meet current housing needs.

#### Included files

**Title** Spatial Strategy for Growth

**ID** EGS14131

**Person ID** 1263506

**Full Name** Ian Brown

#### Organisation Details

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

#### Spatial Strategy for Growth comment

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14143

**Person ID** 1163439

**Full Name** Lindy Weinreb

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I am conscious that the preparation of the Draft Plan by the Borough's Officers has been a mammoth task over many years. I commend their work which has drafted a coherent Plan that updates the multiplicity of documents that comprise the Policies set out by the Adopted Core Strategy of 2013. However. Much that follows in this response and our replies to the questions posed will be very much at odds with the Draft Plan's intention that the Borough should meet the directive on the 'target' number of dwellings determined by the Ministry of Housing Communities and Local Government.

I am horrified by the Draft Plan 2020 which provides for the excessive increases in the population and number of houses to be built over the Plan period 2020 -2038. I cannot agree to this as the projections by ONS do not support the increase planned for. Adopting the proposals in the Draft Plan results in substantial incursions into the Green Belt, including sites on the edges of Berkhamsted , with adverse impact on parts of the AONB. The impact of Covid 19, will mean that large numbers of shops and office premises will be asking for change of use to residential, this has not been taken into account.

To restate much of our reply to the 2017 Reg18 'consultation', future development of Berkhamsted should be consistent with the Core Strategy [2006 – 2031] adopted as recently as September 2013. The house building rates and the Green Belt releases around the market towns that were suggested in some options (to the 2017 proposals) are a significant departure from existing policies in the Core Strategy. Adopting an option that requires large Green Belt releases around the market towns would mean that the Settlement Hierarchy described in the Core Strategy will have been abandoned notwithstanding what is asserted in the Draft Plan. The Core Strategy must carry significant weight in the development of the Local Plan.

I note the Statement by the Minister of State Robert Jenrick of 16th December 2020 on the recent consultation (Changes to the Planning System Aug 2020) :

“There were many 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 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 is crucial that planning is more certain and more transparent, so I will explore how I can make this clearer through our longer-term planning reforms, including considering the right name for this approach.

There is widespread support for ensuring enough homes are built across England to ensure the needs of our communities are met. I heard clearly through the consultation that the building of these homes should not come at expense of harming our precious green spaces. I also heard views that this need can be better met in existing urban areas.”

This conflicts with the proposed releases of Green Belt in the Draft Plan to meet the proposed allocation of housing, especially on the edge of the major settlements, across the Borough.

Moreover, 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.”

**YOU DO NOT HAVE THE SUPPORT OF LOCAL PEOPLE.**

In the same letter the Minister states:

“I 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.

There are many examples that could be used, but I have limited myself to highlighting just six examples of guidance issued by Central Government that shows the policy on Green Belt protection is clear and unambiguous:

- 1) The NPPF provides protection for Green Belt and the land due to be released around Berkhamsted clearly pass the tests.
- 2) In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming “demand for housing alone will not change Green Belt boundaries”.
- 3) Paragraph 9 of the 2017 DCLG “Planning for the right homes in the right places: consultation proposals” 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.”

4) On December 16th 2020 the Government published a response to the recent white paper consultations. With reference to protected landscapes and Green Belt it states, “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”

5) The same response goes on to state “We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.”

6) It further clarifies “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’s sole justification for accepting Government’s numbers (922dpa) as a strict target is simply that “Any option below the standard methodology would have to be robustly justified” (paragraph 5.8 of The Development Strategy Background Topic Paper).

Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I fail to understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified”. Indeed, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the new retrofit Borough Vision fails to reflect any of this.

I note that the urban capacity of Hemel Hempstead has been revisited in light of recent statements from Central Government on the opportunity to increase building heights in suitable locations. I question whether enough weight has been given to the prospective changes to town centres following the COVID19 crisis with many premises likely to be converted to include dwellings.

The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will have been deployed by 2020 (11 years ahead of target) while the rest of Dacorum lags behind target. Such disparities within Dacorum must be taken into account when assessing development numbers and site options going forward.

Infrastructure deficits are now evident across the Borough and only the provision of housing on large sites can deliver the necessary supporting infrastructure without detrimentally impacting on existing settlements. Notwithstanding, contributions from Developers’ S106 and CIL will not meet the full cost of investment in local infrastructure: that will require new Government funding without which residents will continue to suffer the adverse effects of infrastructure deficits.

The blanket assumption that large-scale growth makes delivery of infrastructure easier is misplaced – it will depend on the site and the viability. In the Dacorum Strategic Infrastructure Study [Feb. 2011] this is clearly stated:

“By contrast there are certain types of infrastructure that are more sensitive to the location of demand. Ideally, these types of infrastructure should be located close to the population that they are intended to serve as the extent of the area that they serve (in other words their “catchment”) is very local.”

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14146

**Person ID** 1163439

**Full Name** Lindy Weinreb

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I consider the Housing Growth numbers in the Plan is based on flawed assumptions, I note the text in Para 5.3 – 5.5 [P30]

I acknowledge and welcome the statement “... but will not pursue and urban intensification strategy that detracts from the character of these locations.” However there have been many householder planning applications where greater densification has eroded former Character Area guidance, hence becoming the new default.

The proposed release of Green Belt around Berkhamsted cannot be described as being ‘sustainably located close to passenger transport and other services, facilities and employment opportunities’.

Policy SP2 – the strategic thrust of this policy (Spatial Strategy for Growth) is not supported given that it is based on the contentious growth numbers.

Policy SP2 – Spatial Strategy for Growth includes statement in 3 b.

The Adopted Core Strategy (2013-2036) para 6.2.8 identified capacity (not “need”) in Berkhamsted of 600. Only eight years later this statement indicates that Berkhamsted will have an additional 1600 homes imposed upon it.

The Town Centre already suffers from congestion and suspect air quality, viz data for Lower Kings Road shows the level of NO2 in some periods exceed the 40micrograms/cm3 limit, albeit that the annual record does not show exceedances. In many respects at its current size and topography the Town has reached the limits of capacity as evidenced by traffic congestion, shortage of school places at primary and secondary levels, GP and associated services, sports facilities and

in-town open space. I dispute that the substantial increase imposed on the Town will enhance the quality of life for residents current or future.

I welcome the sentiments of SP2. 4

I have qualified support for SP2.5 with its comment on Neighbourhood Plans: additional growth may not be compatible with community aspirations for their locality.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14164

**Person ID** 1163439

**Full Name** Lindy Weinreb

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** 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

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** Spatial Strategy for Growth

**ID** EGS14166

**Person ID** 1270550

**Full Name** HAZEL WARD

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We wish to object to substantial aspects of the Dacorum Local Plan – Emerging Strategies for Growth. We, as two residents, of Berkhamsted strongly support the challenges made in greater depth by the One Voice Alliance. Our opposition to the Plan is primarily that the housing targets are a matter of local political choice balancing recommendations by Government against Green Belt pressures and infrastructure capacity. Guidance algorithms need using as a guide not a target.</p> <p>Our challenges to the Local Plan are:</p> <ol style="list-style-type: none"> <li>1. The target number of houses requires a more robust justification than the application of an algorithm. As Government Ministers have said the level of housing need has to be demonstrated and exceptional circumstances argued proportionately e.g. use of Green Belt and the capacity of local infrastructure.</li> <li>2. Broad policies such as those for bio-diversity need greater focus and targets to mitigation the loss of Green Belt, and meeting National and Countywide goals for climate change and carbon reduction;</li> <li>3. The demonstration of proposed number of houses needs to have a clear commitment to numbers of affordable starter homes and social housing;</li> <li>4. There could and should be a greater commitment and specific proportions to brownfield land and urban land utilisation (including alternative use of high street /retail properties). These would alleviate the pressure on Green Belt and AONB. These considerations would we believe result in lower housing targets and a more environmentally sensitive Local Plan.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14167
<b>Person ID</b>	1270551
<b>Full Name</b>	ANDREW HOLDER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We wish to object to substantial aspects of the Dacorum Local Plan – Emerging Strategies for Growth. We, as two residents, of Berkhamsted strongly support the challenges made in greater depth by the One Voice Alliance. Our opposition to the Plan is primarily that the housing targets are a matter of local political choice balancing recommendations by Government against Green Belt pressures and infrastructure capacity. Guidance algorithms need using as a guide not a target.</p> <p>Our challenges to the Local Plan are:</p> <ol style="list-style-type: none"> <li>1. The target number of houses requires a more robust justification than the application of an algorithm. As Government Ministers have said the level of housing need has to be demonstrated and exceptional circumstances argued proportionately e.g. use of Green Belt and the capacity of local infrastructure.</li> <li>2. Broad policies such as those for bio-diversity need greater focus and targets to mitigation the loss of Green Belt, and meeting National and Countywide goals for climate change and carbon reduction;</li> <li>3. The demonstration of proposed number of houses needs to have a clear commitment to numbers of affordable starter homes and social housing;</li> <li>4. There could and should be a greater commitment and specific proportions to brownfield land and urban land utilisation (including alternative use of high street /retail properties). These would alleviate the pressure on Green Belt and AONB. These considerations would we believe result in lower housing targets and a more environmentally sensitive Local Plan.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14169
<b>Person ID</b>	1270552
<b>Full Name</b>	Mr Michael Friend
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes

<b>Spatial Strategy for Growth comment</b>	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
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14186
<b>Person ID</b>	1253654
<b>Full Name</b>	Jodie Bell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( Changes in the Current Planning System of August 2020) prepared in this regard in 2020. It appears that the Council™s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation.</p> <p>The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p>

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development

rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council™s inner settlement plans and their assessment of housing needs.

The government website lists that the Green Belt serves 5 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;
- 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I believe that the plan (especially within the Tring and Berkhamsted areas) go directly against every one of these points. The Green belt should absolutely not be built on unless it is absolutely necessary and with the information on population growth and need for housing etc, I believe that we do not need to build on it. We should be looking at taller buildings first rather than spreading outwards.

The UK is one of the most nature depleted countries in the world. One in seven native species face extinction and more than half are in decline. Extensive agricultural lands, road networks and extensive building have reduced the wildlife in the uk to a point hardly seen anywhere else. We are simply not doing enough to turn back the tide. According to the RSPB more than 40 million birds have disappeared from the UK's skies since the 1970s. Tring and Berkhamsted is one of the richest bio diverse areas in the country- we have canals, wetlands, ancient hedgerows, chalk grasslands and woodland. These areas are all incredibly important and desirable which is why it is so important to preserve our Green belt land and this is why I do not support this plan.

If the plan deems it absolutely necessary to build on Green belt land then I would support The Green Party in their idea for every acre of Green belt land in Tring that is developed, 2 acres are re-wilded. I think that this is an excellent strategy to increase biodiversity and keep wildlife loss to a minimum. It would also come under the headline of 'providing great places' as a rewilded green space would become a sanctuary for people as well as nature.

Another point to make is that during the pandemic, green spaces have become of great importance to us all. With nowhere else to go people who would not usually go for walks in the country have discovered their local woodlands making these green spaces so important for our mental health and wellbeing. DBC is part of The Chilterns which has a reputation world-wide as being a beautiful part of the world. Tring and Berkhamsted especially fall under that category. To double the size of Tring would seriously damage, if not destroy its reputation as a beautiful, small market town in The Chilterns.

So by developing on this Green belt I would argue that you would not only be destroying habitats for wildlife, biodiversity and green spaces for people, you would also be seriously harming the towns tourism industry. Green belt land must be protected for this reason. Again, I think that this plan needs to be seriously revised after the pandemic. it is not fit for purpose.

Another point to consider on the topic of sustainability is that there is not enough water to supply this amount of houses. It is a fact that the extra water needed can only be extracted from the chalk aquifer which in turn will damage the boroughs chalk rivers which are classified as priority habitats by the Natural Environment and Rural Communities Act 2006. This is completely unacceptable and shows again, that the plan is not fit for purpose.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14214

**Person ID** 1270572

**Full Name** Bloor Homes South Midlands

**Organisation Details** Bloor Homes - South Midlands

**Agent ID** 210986

**Agent Name** Mr  
Stephen  
Harris

**Agent Organisation** Senior Consultant  
Emery Planning Partnership

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

**Spatial Strategy for Growth comment** Policy SP2 sets out the spatial strategy for Dacorum. For residential development, it makes provision for a minimum of 16,596 homes between 2020 and 2038 which is then distributed as follows:

Hemel Hempstead

- Hemel Hempstead will grow by over 10,600 new homes and will deliver the majority of new employment space. The town will grow to the north by providing a minimum of 1,500 homes with further land to deliver an additional 4,000 homes released from the Green Belt but safeguarded to meet longer term needs

Berkhamsted

- Berkhamsted will accommodate growth of at least 2,200 new homes

#### Tring

- Tring will accommodate growth of at least 2,700 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities
- At the larger villages growth will be apportioned as follows:
  - Bovingdon (240 homes),
  - Kings Langley (275 homes) and
  - Markyate (215 homes).

For Tring which is our main settlement of interest, we consider that this level of development can be accommodated as it is self-contained in that it has all the necessary shops, services and facilities for its residents and it does not depend on Hemel Hempstead or surrounding settlements for education, health, shopping or However the absence of any meaningful growth in the town over the last 15 to 20 years has detrimentally impacted on the vitality and viability of the town. This is set out in the response from the Town Council as set out in the Settlement Profile Paper which sets out a range of points such as the town centre losing retail units, pressure for car parks to be redeveloped for housing and a lack of services and facilities. We consider that a significant boost to the town's population will assist in reviving the vitality and viability of the town.

The draft DLP does recognise that Tring has the potential for additional development and an appropriate level of development will assist in bringing forward new infrastructure such as retail, schools and open spaces for example. To maximise the benefit to the existing services and facilities in the town, sites with a closer proximity to the town centre, such as Waterside Way should be given greater weight in the allocation process.

Overall we support the recognition that Tring will deliver at least 16.3% of the total requirement. As we will establish in our representation to Policy SP4, there should be an increase in the overall requirement for Dacorum of 1,818 dwellings. On a pro-rata basis that would equate to at least 300 further dwellings to be allocated at Tring. Waterside Way is a site that can meet that additional need.

#### Included files

**Title** Spatial Strategy for Growth

**ID** EGS14217

**Person ID** 1270581

**Full Name** MR & MRS DUNCAN

#### Organisation Details

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note</p>

that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14226

**Person ID** 1270582

**Full Name** NADIA LUPO

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	<p>In response to the draft local plan entitled ‘Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation’ I would like to register my objections as follows:</p> <ul style="list-style-type: none"> <li>— I object to the proposals in the consultation because the proposals to build on the green belt are wrong.</li> <li>— I understand that there needs to be proof that building on the Green Belt is absolutely necessary before Green Belt land can be released. This has not been shown: <ul style="list-style-type: none"> <li>— The housing projections are based on out-of-date statistics</li> <li>— The needs of local people have not been prioritised over the needs of developers</li> <li>— There has not been enough scrutiny of brown field sites</li> <li>— CV19 has changed behaviour meaning more town centre development is possible - this has not been taken into account</li> <li>— There are too many houses in general and too many people in our town</li> <li>— Not enough care has been taken to protect the local ecology - the demand for water will damage the aquifer and the internationally recognised chalk streams</li> <li>— The plans are not carbon neutral and conflict with commitments to tackle climate change</li> <li>— The houses proposed will encourage people to use cars as they are not near employment or transport hubs.</li> <li>— The increased populations in Tring and Berkhamsted will mean more traffic travelling along Northchurch High Street, leading to congestion, increased pollution, health problems, road safety concerns — this will be bad for the mental and physical health of our residents and future generations.</li> </ul> </li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14233
<b>Person ID</b>	1145687
<b>Full Name</b>	Mrs Polly Walker
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	there is no mention in the strategy on how the plans with cope with the extra strain on water supply and waste management. Currently we draw a vast amount of water from out chalk aquifer, and drawing more would have a huge impact on our

local environment, potentially threatening our local chalk streams and rivers, which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. Climate Change Committee Sixth carbon budget report Dec 2020 contained a set of recommendations for Local authorities to consider in helping them meet their Climate Emergency objectives. There is no evidence in the proposed plan on how these recommendations have been considered. The plan as proposed would place an unacceptable burden on services, facilities and other infrastructure in Dacorum, and has not been justified when set against national planning policies and the major constraints that exist in the borough. For instance: clogged traffic in town centres and on the major roads in the borough including the A414 and the A41; insufficient cycling lanes throughout the borough; narrow or non-existent pedestrian pavements in many of the built-up areas; insufficient capacity of the local healthcare system with the nearest acute care in Watford, Buckinghamshire or Bedfordshire.

The number of proposed houses within the development were developed by an algorithm rather than guided by actual requirements. The latest projections from the Office of National Statistics says that 355 dwellings per year are required for Dacorum, but the development plan is putting forward 922 developments or possibly over 1000 developments per year depending on the algorithm of choice at the time. The National Planning Policy Framework expects local authorities to use the latest available information and therefore this should result in housing need calculation that is less than half of that currently proposed in this plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14236

**Person ID** 1264711

**Full Name** Timothy Symington

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The proposal is to build principally at low density on sites taken Green Belt. The sites will cover large areas of land that are far from town centres, high streets and public transport hubs - for example the sites around Tring and Berkamsted; and the extension of Hemel Hemstead enveloping Picotts End and reaching Water End. This virtually guarantees that the occupants of the new homes will need to make car journeys for most excursions - eg for shopping, to get to work,

to get to pubs, clubs and restaurants. The Plan fails to factor this in. This in turn undermines the claims made in the Plan regarding sustainability.

It would be far more sustainable to develop brownfield sites with high density housing in or near town centres. Very few such sites are included in the Plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14239

**Person ID** 1270586

**Full Name** RACHEL CHAPMAN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I totally support the One Voice alliance in standing against the Draft Local Plan as per the following message:

*"We the Chiltern Society, Chiltern Countryside Group, Grove Fields Residents Association (GFRA), Berkhamsted Residents Action Group (BRAG), Kings Langley & District Residents Association (KL&DRA), Berkhamsted Citizens 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."*

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14246

**Person ID** 1152075

**Full Name** Rob Wakely

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The plan must ensure adequate Social Housing, which is net zero in operation, as defined in my answer to question 1.

The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14277

**Person ID** 1270629

**Full Name** Rob Bray

**Organisation Details** Head of Sponsorship & Fundraising  
Tring Rugby Club

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>(5) Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.</p> <p>In simple terms, the facilities we currently have at Cow Lane, Tring are too small and the funds and land available to facilitate any expansion are extremely limited. The playing and support base is largely drawn from Tring, Berkhamsted and surrounding villages but also further afield. The increase in housing and population proposed would actually be detrimental to the rugby club as we simply couldn't manage with the additional demand from the expanded population and would alienate the elements of the community we would have to turn away. The clubhouse, pitches and parking are too limited to enable expansion. While we would welcome an opportunity to cater for more players and supporters the land and facilities in their current form cannot cope.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14301
<b>Person ID</b>	1259141
<b>Full Name</b>	Kirsten Riemer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust.</p> <p>Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement</p>

against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council’s inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14312
<b>Person ID</b>	1270635
<b>Full Name</b>	Catherine Bright
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area. It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a</p>

requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14319

**Person ID** 1270637

**Full Name** TOM GROVES

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** Too many houses proposed for the scheme to be sustainable

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS14346
<b>Person ID</b>	1270640
<b>Full Name</b>	Geoffrey Llewellyn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The Plan does not achieve the objective it sets itself because growth will be accommodated 3-4km from the town centres. These, by definition are located at a distance away from “passenger transport and other services, facilities and employment opportunities”. Paragraph 19.6 of the Plan does say “In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries.’ But, beyond that statement there is absolutely no justification offered, except the Government ‘target’ that isn’t actually a ‘target’.</p> <p>Indeed 19.7 also specifically states DBC have “identified those areas on the edge of the main settlements where exceptional circumstances exist”, thus inferring that exceptional circumstance exist for the settlements protected by the specific Green Belt releases. These “exceptional circumstances” are certainly not evidenced.</p> <p>BRAG have demonstrated that DCB is building a massive oversupply of housing compared to ONS estimates. Why? What is the justification?</p> <p>DCB have underestimated the number of windfall developments by 56% this despite the likely impact of change of use as a result of different working patterns following on from the pandemic. The cost is 850 hectares of irreplaceable Green Belt land. It’s almost as though the Council <b>want</b> to join up all the towns in a ribbon development to deprive them of their individual identities and their countryside.</p> <p>As BRAG states :</p> <p>“Statement 2 in SP2 starts “The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring”. BRAG is concerned about this wording as in its current form it suggests that ‘investment’ will be focused on Hemel Hempstead and that investment will be supported by the growth at Berkhamsted and Tring. Certainly, historically infrastructure investment in Berkhamsted has not matched housing growth, while the majority of funds raised through s106 from developers compensating for the failure to build affordable housing and the Community Infrastructure Levy (CIL) payments have gone into Dacorum’s coffers for funding investment elsewhere. With much higher CIL payments in Berkhamsted than elsewhere in Dacorum, it is easy to see the fiscal attraction of promoting development in Berkhamsted, but if that is a driver then it is wrong.” It’s also unjust.</p>

Other key points:

23.119 accepts that “congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.

The new developments in Berkhamsted and Tring are so far from transport of other amenities that they cannot be justified sustainably, walking and cycling are not solutions.

The numbers proposed by DBC as a whole across the Borough are flawed. It worries me that the Plan has a target of ‘at least 2,200 new homes’ for Berkhamsted and Northchurch. The adopted Core Strategy identified growth of 1,180 homes over that plan’s 25-year lifespan, which equates to 47.2dpa. In reality, Berkhamsted has contributed to the Dacorum’s new housing stock at a rate of 61.9dpa – in other words completions have out-performed the target by 31.2% in Berkhamsted **while new housing stock in Hemel Hempstead has fallen behind the town’s target by 9.3%**. Much of this can be explained by developers’ demand to build in Berkhamsted rather than satisfying need, i.e. Berkhamsted growth is becoming developer led rather than planning led and this Draft Local Plan as proposed is facilitating that process. Another injustice. Besides which, if the housing was affordable then there would not be so much pressure to build in Berkhamsted. Developers are building not for the people who live here but from people moving in from outside the area. This represents a failure to implement the existing Plan and meet existing needs of people living in the area.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14353

**Person ID** 1270641

**Full Name** WILLIAM ALLEN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment** The delivery strategies include a large amount of greenbelt which should only be released in exceptional circumstances. Given the absence of up-to-date evidence for the excessive level of building outlined in the plan, these exceptional

circumstances do not apply. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release green belt.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14402

**Person ID** 1270653

**Full Name** NEIL BRANCH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Development on Green Belt sites was agreed by ministers to be restricted unless in 'exceptional circumstances' yet the council has made no effort to justify the proposed development.

The increased demand on water supply would have a severe effect on the local chalk streams with new water sources unlikely to be available until long after development has begun.

The towns infrastructure for wastewater and sewage would need major upgrade at a huge disruption to the area and great expense.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14406

**Person ID** 1270653

**Full Name** NEIL BRANCH

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Green belt sites should be only explored as possibilities for development after all brownbelt/urban development areas have been considered
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14415
<b>Person ID</b>	1270662
<b>Full Name</b>	MAX GOODE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	LCR and NR also support the specific spatial strategy for Hemel Hempstead and considers that the draft allocation can significantly contribute to meeting the targets and objectives of draft Policy SP2 (Spatial Strategy for Growth).
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14435
<b>Person ID</b>	1270665
<b>Full Name</b>	Cllr Stephen Claughton
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The draft Plan does not recognise that patterns of employment in the Borough are likely to change as a result of the Covid-19 pandemic. These may include more home working, less office use and a reduction in commuting to London. The Plan also fails to address the Glover Review, which proposes to make the local Area of Outstanding Natural Beauty (AONB) into the Chilterns National Park and contains proposals that may damage the AONB.</p> <p>The Plan also fails to recognise the topographical constraints that place limits on Berkhamsted's capacity to absorb further development. The substantial increase in the size of the town that is envisaged will do nothing to enhance the quality of life for present or future residents. There is also no commitment to preserve or improve local employment opportunities in or in the vicinity of Berkhamsted.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14448
<b>Person ID</b>	1265051
<b>Full Name</b>	Edmund Knox
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly dispute the scale of the target for housing in Dacorum raised within this Local Plan - 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. I believe there is enough non-green belt land identified within the Dacorum Local Plan to provide 5,950 houses.</p>

I agree with the plan's approach to prioritise housing growth in Hemel Hempstead - a 23% growth (10,600 houses) in housing, it is clear that this facilitates the ability to make the most efficient use of brownfield land, local services to facilitate housing growth whilst minimising any potential impacts upon the Green Belt.

The new local plan vision provides for a substantially disproportionate growth strategy for housing within Tring (55% growth) that fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan period - only a 13% growth in housing in these settlements.

I strongly object to the proposal that Tring is required to " play a much greater role in delivering housing growth " within the borough - a 55% growth (2,700 houses) in housing in Tring. As a result of this Council growth proposal for Tring, there is a disproportionate Green Belt allocation required to build the houses than there would be if the housing growth was shared more proportionately across all settlements i.e. 23% growth in Hemel Hempstead with the remaining growth shared equally between the remaining settlements.

Whilst I accept that the aspirations for existing and new residents and visitors should be met, this should not come at the direct expense of substantial and unjustified housing growth that substantially impacts upon the openness of the Green Belt and the Area of Outstanding Natural Beauty.

I strongly object to your claim that your vision of Tring has " delivered a comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape or protected environmental sites. " This Local Plan draft has failed to bring forward exceptional circumstances so as to justify what is a significant intrusion into the open Green Belt to the East of Tring.

Any new planned development to the east of town would by way of its introduction fail to take account of the sensitive views, landscape and protected environmental sites that is sought to be addressed by way of the vision . Such is the sensitivity of the land in question that any change to its use, particularly that associated with the introduction of built infrastructure would cause unquestionable damage to the Green Belt and the Area of Outstanding Natural Beauty for which there has been no evidence for its justification and no evidence to identify that it can be sufficiently mitigated.

I welcome the requirement to provide a mix of market and affordable housing together with new community facilities and economic growth within the area. I believe that such delivery can be delivered proportionally and reasonably within the existing settlement boundaries associated with Tring and other settlements and that the opportunities in this regard have not been sufficiently examined .

The requirement for two primary schools and a secondary school is a by-product of the substantial housing growth proposed to be allocated within the Local Plan that I strongly object to. Such wide scale growth to Tring has not been sufficiently justified and as such the requirement for two further primary schools and a secondary school are as a by-product and therefore likely to be unnecessary.

The delivery of open space and sports and leisure facilities should be encouraged, however such facilities and open space should not be delivered at the expense of the loss of widespread open countryside and land which contributes to the Area of Outstanding Natural Beauty given that such a loss would be substantial and would defeat the purpose of seeking to secure new open space and leisure facilities for the health and wellbeing of local people. Consideration should be given to the opportunity to deliver new open space and sports and leisure facilities in their own right instead of such facilities being packaged into a wider growth strategy that includes an inappropriate provision of housing growth.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14449

**Person ID** 1265051

**Full Name** Edmund Knox

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August

2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14460

**Person ID** 1265051

**Full Name** Edmund Knox

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth 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** Spatial Strategy for Growth

**ID** EGS14462

**Person ID** 1270669

**Full Name** Taylor Wimpey Taylor Wimpey

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

- Policy SP2 (Spatial Strategy for Growth) seeks to direct new development towards the Borough's most sustainable settlements and is therefore supported insofar as Berkhamsted is recognised in Policy SP2 and Policy SP3 (Settlement Hierarchy) as one of the Borough's most sustainable towns, being the second largest settlement area in Dacorum, and where significant new growth is to be directed in the next plan period (2020 – 2038).

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14463

**Person ID** 1270669

**Full Name** Taylor Wimpey Taylor Wimpey

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>Berkhamsted's ranking in the settlement hierarchy is supported and reflects the excellent range of local services and amenities available to meet the day- to-day needs of residents as highlighted by the Settlement Hierarchy Study (2017) and its role as a service centre for surrounding villages. It also demonstrates a good range of public transport options, including regular train services along the West Coast Mainline to major employment centres such as Hemel Hempstead, Watford, Milton Keynes and London and the range of local bus services connecting Berkhamsted to nearby towns, as detailed in the Berkhamsted and Tring Sustainable Transport Strategy (AECOM, November 2020).</li> <li>The level of housing growth proposed for Berkhamsted appropriately reflects the sustainability of the town and will contribute positively towards meeting the Borough's significant housing needs. The proposed Allocations, including Land East of Darr's Lane (Site Reference: Bk06), will support the objectives of sustainable development and further strengthen Berkhamsted's role as a key and attractive market town within which to live, work and enjoy.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14471
<b>Person ID</b>	1270672
<b>Full Name</b>	ICP Asset Management Ltd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	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.

The Plan is not justified, as it is not the most appropriate strategy based upon the evidence base.

These representations request that the Council undertake the following:

- 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;

Recognise the important economic role that care homes provide.

**Included files**

**Title**

Spatial Strategy for Growth

**ID**

EGS14473

**Person ID**

1171463

**Full Name**

Kings Langely & District Residents Association

**Organisation Details**

Kings Langley and District Residents association

**Agent ID**

1270673

**Agent Name**

Jed  
Griffiths MA DipTP FRTPI

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

The Basis for the Strategy

8. KL&DRA notes the conclusions of the South West Hertfordshire Local Housing Needs Assessment (August 2020) and the calculation of the housing need for Dacorum Borough Council. The total number of 16,500 dwellings for the plan period; at 922 dwellings per annum, shows a marked increase in the rate of dwelling increase compared to the adopted Local Plan. The numbers are underpinned by the Government requirement, set out in National Planning Practice Guidance (NPPG), to forecast housing needs based on a standard methodology using 2014-based projections of population and households.

9. It is understood that the Government intends to review the standard forecasting methodology as part of the delivery of the proposals in the Planning White Paper. In the meantime, local planning authorities are required to use outdated

2014-based projections for the forecasts of housing needs. There has been widespread criticism of this Government Directive. In 2016, the responsibility for the production of the bi-annual forecasts of population and household formation passed from the Ministry of Communities, Housing and Local Government (MCHLG) to the Office for National Statistics (ONS). Using a more updated statistical base, the ONS has published successive forecasts, 2016-based and 2018-based, which are 'much lower than the previous forecasts produced by MCHLG.

10. It is clear that the most recent ONS 2018-based forecasts indicate that there has been a "meaningful change" in the factors which contribute to the calculations, which have led to a reduction in housing needs figures. A recent study by the Hertfordshire Branch of the Campaign to Protect Rural England (CPREH) compared alternative ways of-projecting housing need in the county, using the Government's standard methodology. For Dacorum, the annual housing need using the current standard methodology and the 2014-based

- projections showed an annual rate of housing need for 2020-2036 of 1,022 dwellings per annum. By contrast, using the standard methodology and the ONS 2018-based projections, the rate reduced to 536 dwellings per annum.

11. There are a number of reasons for this fundamental trend, which is common to all local authorities in Hertfordshire. The main cause is a lowering of migration rates into the county,

- both internal and international, plus an excess of deaths over births, with an ageing population profile. Based on the evidence, KL&DRA anticipates that these changes will continue into the future, and will be heightened by the effects of Brexit and the fall-out from the COVID-19 pandemic. In the Housing Topic Paper, at paragraph 6.30, the Borough Council states that it will keep the housing need figure under review. This intention is welcomed, but 'in view of the dramatic reduction in the demographic starting point for projection by 50%, KL&DRA recommends that a fundamental review is required urgently, before the final Regulation 19 draft of the Local Plan is published.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14479

**Person ID** 1270672

**Full Name** ICP Asset Management Ltd

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Spatial Strategy for Growth comment</b>	<p>The Spatial Strategy for Growth (Section 5, p.30) follows the Sustainable Development Strategy. Whilst ICPAM generally agrees with the Strategy, they consider that there should be an additional bullet point which prioritises the use of previously developed land in non-urban areas wherever possible over greenfield land. The NPPF is clear at para 138, in that where it is necessary to release Green Belt land, plans should give first consideration to land which has been previously-developed <b>and/or</b> is well-served by public transport (emphasis added).</p> <p>Thus, previously developed land in the Green Belt should be prioritised over and above land that is not previously developed. Whether that previously developed land is well-served by public transport is not a pre- requisite for prioritisation; instead it is a factor that should be weighed in the balance against other considerations as part of the wider considerations for allocating (or not) land.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14480
<b>Person ID</b>	1270672
<b>Full Name</b>	ICP Asset Management Ltd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Policy SP2 – Spatial Strategy for Growth should be amended to include a housing target for older persons and care accommodation. This figure should not be included within the 16,596 homes at 1a and should be an additional figure to reflect that those needs are in addition to the market and affordable homes part of 1a.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14488
<b>Person ID</b>	1270679
<b>Full Name</b>	GLENEDEN PLANT SALES LTD

<b>Organisation Details</b>	
<b>Agent ID</b>	1270678
<b>Agent Name</b>	MR WILLIAM LLOYD
<b>Agent Organisation</b>	DLP PLANNING LTD
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>Draft Policy SP2 (Spatial Strategy for Growth) states that the Local Plan will make provision for a minimum of '16,596 homes' during the Plan period between 2020 and 2038. The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring, and then the large villages, including Markyate.</p> <p>We are broadly supportive of draft Policy SP2 and welcome the minimum targets identified which should enable greater levels of growth to be achieved, through being adaptive to change. This potential flexibility is a crucial factor in the current and foreseeable climate. We believe that the large village of Markyate, which is designated to deliver 215 homes through the plan period, can appropriately deliver a higher number. This is in part because of the existing support services and facilities available and the existence of appropriate sites for development.</p> <p>However, there is an overall lack of emphasis in the draft policy in respect of the importance of the contribution to be made by brownfield sites/previously development land (PDL) which should form the first priority in identifying appropriate development opportunities. In this respect, Paragraph 117 of the National Planning Policy Framework (February 2019) states that:</p> <p>“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.”</p> <p>Thus, clearly highlighting that brownfield sites should be set out in the development strategy and given preferential treatment to enable the delivery of such land, rather than utilising greenfield sites for development.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14501
<b>Person ID</b>	1270685
<b>Full Name</b>	Ms Jan Kerry
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
Agent Organisation	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p>

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14511

**Person ID** 1270383

**Full Name** Mr Nigel Kerry

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in

planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would

have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14521

**Person ID** 1270690

**Full Name** Akzo Nobel CIF Nominees Ltd

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Our client supports the Council's Spatial Strategy for Growth (Policy SP2) with the emphasis on the delivery of sustainable development through utilising urban land, as well as extensions to sustainable settlements such as Berkhamsted. Our client therefore supports the Council's approach to sustainable development set out under Policy SP1 and consider it to be consistent with paragraphs 11-16 of the NPPF.

Our client does however question the scale of growth at Hemel Hempstead (10,600 new homes) which is dependent on significant infrastructure works which could be delayed and therefore affect delivery. DBC should build suitable contingency into their Local Plan in the interests of delivering housing to satisfy its OAN, as a minimum and therefore ensuring it has been positively prepared in accordance with paragraph 35(a) of the NPPF.

Our client welcomes the identified growth at Berkhamsted for at least 2,200 new homes and enhancements to the town centre to strengthen its market town function. However, this level of growth is low and CBRE argue Berkhamsted can accommodate further growth due to its sustainable location and key market town status.

In reference of the proposed release of Green Belt land on the southern fringes of Berkhamsted, the Council should prioritise the effective use of urban sites and reuse of brownfield land before concluding exceptional circumstance exist to release Green Belt sites in accordance with paragraph 137 of the NPPF. The Council should look at identifying further sustainably located, brownfield sites on the urban area of Berkhamsted to deliver new homes, including Land at 168-192 High Street, Berkhamsted which is suitable for circa 80 new apartments, including either as new market and affordable homes as part of a residential-led mixed use development or 80 new age-restricted apartments for older persons as part of a managed later-living scheme.

Given the profile of Dacorum Borough, the proposed scale of growth required and the Council's obligation to meets its housing requirements, it is accepted that there needs to be some Green Belt release in appropriate locations, however the proposed Green Belt release to the south of the existing settlement boundary of Berkhamsted is not deemed suitable in the interests of sustainable development and crucially, preserving openness in accordance with paragraph 133 of the NPPF.

In response to the Council's Spatial Strategy for Growth (Policy SP2), our client welcomes the identified growth at Berkhamsted, including the provision of at least 2,200 new homes and enhancements to the town centre to strengthen its market town function. However, additional housing growth can be accommodated at Land at 168-192 High Street, Berkhamsted which is suitable for circa 80 new apartments, either as new market and affordable homes as part of a residential-led mixed use

development or 80 new age-restricted apartments for older persons as part of a managed later-living scheme.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14537

<b>Person ID</b>	1163978
<b>Full Name</b>	John Wignall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Heme! Hempstead.

The housing needs delivery strategy was that Heme! Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14546

**Person ID** 1270698

**Full Name** Ms Elizabeth Hamilton

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

* No	
<b>Spatial Strategy for Growth comment</b>	<p>In my view the Consultation document fails to provide any adequate justification for the growth rates proposed for the Borough.</p> <p>The Emerging Strategy for Growth 2020-2038 (the Strategy) is deficient in a number of key areas:</p> <ul style="list-style-type: none"> <li>• It proposes unnecessarily excessive housing growth while at the same time failing to plan sufficiently to ensure the provision of affordable housing to meet housing need</li> <li>• It fails fully to comply with the statutory obligations of all local planning authorities to plan for climate change mitigation and resilience</li> <li>• It does not have sustainable development embedded in all aspects of the proposals</li> <li>• It fails to tackle the biodiversity crisis across the Borough</li> <li>• It fails to protect the countryside of the Borough, including the Green Belt and the protected landscapes of the Chilterns Area of Outstanding Natural Beauty (AONB)</li> <li>• It does not fully take into account the current deficiencies in infrastructure which will need to be rectified over an unspecified time period and at very considerable cost</li> <li>• It does not reflect current trends in the economy and ways of working, especially in retail and office-based activity, including those brought into focus by the pandemic</li> <li>• It will not create inclusive communities, underpinned by excellence in place-making, which support health and well-being</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14547
<b>Person ID</b>	1270698
<b>Full Name</b>	Ms Elizabeth Hamilton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

\* No

**Spatial Strategy for Growth comment**

The total number of new homes proposed by the Strategy during the plan period is 16,596. Most are proposed to be built on 850 hectares of Green Belt, countryside and urban green spaces, requiring the release of 746 hectares of Green Belt, much of it adjoining the Chilterns Area of Outstanding Beauty. This would cause irreparable harm to the environment and biodiversity of the Borough area. The population would grow by nearly 30%, and much more in Tring, where a 60% increase is proposed. The impact on town centres, infrastructure, pollution, roads, schools, medical services and quality of life for existing residents would be totally unacceptable. Water could be in short supply during drought periods well before the end of the plan period. None of this self-assessed level of growth is justified by national government policy, which allows constraints like Green Belt and protected landscapes to influence housing growth.

Paragraph 1.3 in the introduction states that Dacorum Borough Council 'is having to accommodate a significant increase in development'. Paragraph 1.10 states 'We have known for some time that the level of growth we need to plan for will be significantly higher than before (up from 430 dpa in the Core Strategy) and whilst the final figure from the Government may be adjusted again we expect this to remain a substantial number'.

Paragraph 2.3 in the Vision and Strategic Objectives states 'One of the major challenges for the Borough is delivering a step change in the level of housing growth as required by the Government'.

These statements are all misleading and need to be substantially revised, not least following the announcement made by the Ministry of Housing, Communities and Local Government on 16th December 2020, titled *Government response to the local housing need proposals in 'Changes to the current planning system'*. This included the following text:

- 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 should be clear that meeting housing need is never a reason to cause unacceptable harm to such
- We can plan for well designed, beautiful homes, with access to the right infrastructure in the places where people need and want to live while also protecting the environment and green spaces communities most
- If we do this well, we can achieve all this whilst giving a new generation the chance to access the homes they It would be wrong for our built environment to respond only to the needs of older, wealthier people.
- We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing
- 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

- 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 (are) most appropriately located. In doing this they should take into account their local circumstances and

When announcing this consultation outcome to Parliament, the Secretary of State Robert Jenrick added:

- We heard clearly through the consultation that the building of these homes should not come at (the) expense of harming our precious green spaces. We also heard views that this need can be better met in existing urban
- There are good reasons for this. First, our urban centres are the best-served by existing infrastructure – with schools, shops and medical
- Second, building more homes in our cities and urban centres will mean making the best use of brownfield land, of which many cities and urban centres continue to have large quantities, and protecting our countryside as much as possible.
- Third, building homes around our transport hubs will help us to deliver our ambition to tackle climate change by offering greater access to more sustainable forms of transport and reducing unnecessary
- In the months since we consulted, the profound impact of COVID-19 on our towns and cities has become even clearer. It has magnified and accelerated patterns that already existed and while it is too soon to know for certain the scale of the long-term impact, it is very likely to present a generational challenge and opportunity to repurpose more commercial centres, offices and retail spaces into housing and mixed

Paragraph 11b(i) of the NPPF states: 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. Footnote (6) lists these assets, which include Sites of Special Scientific Interest, Green Belt, Local Green Space and Areas of Outstanding Natural Beauty. Thus the proposals in the Strategy do not accord with the NPPF.

- 1 HOU
- 2 OBJ - HOUS

The Strategy is rightly concerned to achieve a significant increase in affordable housing to meet the needs of the Borough. This should include housing designed to accommodate the 60% increase in the 65 and older age group expected in the Borough in the next 20 years. Heavy reliance on market housing development in the Green Belt is unlikely to deliver the affordable housing needed. A recently published report from CPRE the countryside charity (Countryside next door: State

of the Green Belt 2021, February 2021) found that only 10% of homes in developments planned in the Green Belt between 2015 and 2020 were considered to be affordable.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14550

**Person ID** 1270698

**Full Name** Ms Elizabeth Hamilton

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Para 5.2 on page 30 of the Strategy states that a key principle behind the Strategy will include:

- Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected

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). **There should be no such impact.**

Policy DM27 of the Strategy states: 'All development shall help conserve, restore or enhance the prevailing quality, character and condition of Dacorum's natural and historic landscape'.

It goes on to state: 'Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it:

- 1 conserves and enhances the Chilterns AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the

AONB designation'.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14553
<b>Person ID</b>	1270698
<b>Full Name</b>	Ms Elizabeth Hamilton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>The CCB Management Plan must be taken into account by Local Planning Authorities when developing local plans within or affecting the AONB and it may be a material consideration when considering planning applications. The 2019-24 Management Plan states:</p> <p>‘A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority’s legal duty towards the AONB applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). We have produced special advice in a Position Statement on Development Affecting the Setting of the Chilterns AONB. The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary.’</p> <p>Specific points in the Position Statement include:</p> <p>Views out of the AONB and into its surrounding areas can be very significant. Development proposals that affect views into and out of the AONB need to be carefully assessed, particularly in line with the National Planning Policy Framework and National Planning Practice Guidance, to ensure that they conserve and enhance the natural beauty and landscape character of the AONB. This applies to views of the AONB from outside of it and views out of the AONB, in both cases particularly from public viewpoints or rights of way.</p>

Other impacts mentioned in the Position Statement include:

- The visual intrusion caused by the introduction of new transport corridors, in particular roads and railways;
- Loss of tranquillity 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 in 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
- Adverse impacts might not be visual. The special qualities of the Chilterns AONB include A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14564

**Person ID** 1270700

**Full Name** Mr Peter Sims

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

- The 'sustainable development strategy' isn't a sustainable development strategy at all, it's a house building strategy or development strategy. A 'sustainable development strategy' is a bit of an oxymorn, as development isn't necessarily sustainable. The level and rate of construction (aka development of the build enviroment) is actually causes a significant proportion of our carbon emissions so is currently incompatable with zero carbon. There is significant evidence that reaching zero carbon requires a significant reduction is the amount of construction activity as it is very difficult to decarbonise steel, concrete, bricks and other building

Evidence:

<http://withbotheyesopen.com> <https://ukfires.org/absolute-zero/>

What the Borough needs is a “sustainability strategy” which sit above all other strategy, and determines the overall direction of travel. Then the “Local Plan” can outline what land use change, retrofit of existing buildings, and new buildings is needed to achieve zero carbon and wider sustainability. Development must be constrained by sustainability, or using the word ‘sustainability’ is pointless, and misleading.

- It is made abundantly clear that the ‘sustainable development strategy’ is really a ‘house building strategy’ by the fact that all of the rest of the detail about it is all about building housing. This local plans is so dysfunctional and confused as a set of documents that it isn't in a fit state for the public to How can this country call itself a democracy and this exercise call itself a ‘consultation’ if the basic step of honestly and clearly communicating what the current proposed are and why they've come about doesn't happen.
- What is need is a sustainability strategy which is about how the borough can get to zero carbon, restore and enhance biodiversity, and improve sustainability in terms of material use and pollutions. This would then be primarily about retrofitting existing buildings, land use change including changing agricultural practice, planting woodland, restoring habitat, urban green infrastructure...
- Clearly the government arbitrary house building plans are in the interest of the borough so the borough should be telling them so, and refusing to implement them. Yes there is some housing building needs in the area, but these are mostly little bits of small cheap terraced housing for young people currently price out of the area, selfbuilt plots for all those who've been on waiting lists for ever and rural works unable to live near whether they work.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14586

**Person ID** 1270707

**Full Name** Ms Debbie Wilson

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<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 high levels of air pollution and the continuing lack of clean drinking water in this area have not been considered with increased breathing related illness, asthma etc, this area needs conservation not concrete.</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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14587
<b>Person ID</b>	1270707
<b>Full Name</b>	Ms Debbie Wilson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	

<p>* <b>Yes</b> * <b>No</b></p>	
<p><b>Spatial Strategy for Growth comment</b></p>	<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 technologies should be incorporated into the plan.</p>
<p><b>Included files</b></p>	
<p><b>Title</b></p>	<p>Spatial Strategy for Growth</p>
<p><b>ID</b></p>	<p>EGS14589</p>
<p><b>Person ID</b></p>	<p>1270707</p>
<p><b>Full Name</b></p>	<p>Ms Debbie Wilson</p>
<p><b>Organisation Details</b></p>	
<p><b>Agent ID</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Agent Organisation</b></p>	

<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<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>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14591
<b>Person ID</b>	1270707
<b>Full Name</b>	Ms Debbie Wilson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<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> <p>Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14619
<b>Person ID</b>	1270726
<b>Full Name</b>	Mr Renshaw Watts

<b>Organisation Details</b>	Pennard Bare Trust
<b>Agent ID</b>	1270725
<b>Agent Name</b>	Mr David Carlisle
<b>Agent Organisation</b>	AECOM
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>The emerging Local Plan growth strategy focuses housing delivery in the main settlement of Hemel Hempstead, the market towns and suggests a modest uplift in larger villages inset in the Green Belt. The consultation document notes that some windfall development is expected in villages in rural areas and within the Green Belt.</p> <p>A more proportional growth strategy can be established by allocating a moderate level of housing development in smaller villages, commensurate to their: size (population and number of dwellings); services; environmental constraints; and degree to which development would preserve the local character and function of the village. This approach would also further reinforce the NPPF's aspiration to provide a "variety of land to come forward where it is needed" (paragraph 59). The spatial distribution is based on the 2017 settlement hierarchy assumptions which were developed to inform the then Core Strategy review process. Since then, the housing need methodology has been updated increasing the housing targets for DBC. Additional opportunities for development must therefore be explored. This presents an opportunity to re-evaluate the settlement hierarchy used to support the current spatial growth distribution and identify where growth is needed in small villages for these to remain sustainable.</p> <p>The emerging growth strategy allocates a number of small to medium sized strategic and non- strategic sites for housing development, particularly in the earlier years of the plan period. This is said to provide further flexibility and to reduce reliance on larger Growth Areas and strategic allocations.</p> <p>Nonetheless, the consultation document acknowledges the sudden short-term housing market uncertainties caused by the COVID-19 pandemic and challenges caused by the significant increase in housing needs compared to past requirements. On that basis, flexibility awarded by smaller housing developments may need to be available throughout the plan period to ensure a steady delivery of housing.</p> <p>Further growth in the villages can help to strengthen the emerging plan's ambition for further resilience in response to COVID-19 including creating better digitally connected places to help businesses and communities respond to these changes. Such infrastructure improvements may be facilitated by further enabling housing growth, through financial or physical contributions.</p> <p>We believe that a more robust long-term approach must be applied to the borough's growth strategy and further consider the challenges caused by the revised local housing needs and changing ways of working as a result of the pandemic. The consultation document seeks to significantly boost the Council's housing supply, in particular increase the number of new and genuinely affordable homes in the Borough and provide growth in the villages that reflects their role and</p>

character. However, this aspiration arguably does not extend fully to villages washed over by the Green Belt which have been prematurely sieved out as sustainable locations for growth purely as a result of their Green Belt status and site selection method.

DBC seeks to accommodate growth that supports the long-term function of the towns and villages. The emerging plan also acknowledges that all the growth cannot be accommodated within the urban areas, “so despite our approach to increasing densities and heights, we do need to release land in the Green Belt.” We would take this a step further and ask that DBC consider the larger rural villages such as Flamstead.

The spatial strategy, as proposed, avoids directing significant development to the villages on the basis that these areas are the least sustainable locations, more sensitive to change and with poor access and public transport infrastructure. However, these conclusions are not all applicable to Flamstead.

The village benefits from a direct access onto the M1, connecting to Hemel Hempstead and Luton, and public transport access to the nearby village of Markyate for further services. A more proportional growth distribution could be utilised to reflect the additional requirement of 1,818 homes over the plan period. This is explored in more detail in the following section.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14626

**Person ID** 1270729

**Full Name** MR & MRS A HOUGHTON

**Organisation Details**

**Agent ID** 1270728

**Agent Name** MS  
KAREN  
GALLEY

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Only accurate level of need can be used to weigh up against the constraints and risk assessment of using Green Belt. Aside from Hemel Hempstead, which provides the majority of housing supply, the housing delivery strategy across Tring, Berkhamsted, Bovingdon, Kings Langley and Markyate was to be equally split, however the latter three settlements have been discounted because of constraints on infrastructure. What is the assessment of compounded impact for the proposed allocation across Tring?

SP2 seeking to protect existing office and retail space has not had a chance to consider current market conditions and changes to working practice (still emerging), and the ongoing likelihood of opportunity to convert office and retail space to residential units.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14635

**Person ID** 1270731

**Full Name** MRS JOAN EELEY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ("Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14645
<b>Person ID</b>	1265051

<b>Full Name</b>	Edmund Knox
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14673
<b>Person ID</b>	1270738
<b>Full Name</b>	JOHN BELL
<b>Organisation Details</b>	SECRETARY
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* <b>Yes</b>	
* <b>No</b>	

**Spatial Strategy for  
Growth comment**

We are writing to submit our response to the Local Plan. We welcome the opportunity to contribute to this consultation and hope that you listen to our response and to that of other respondents, and look forward to seeing the revised Local Plan once all points raised are properly addressed.

The Local Plan is clearly not fit for purpose for many reasons, with two being foremost:

- 1 The increased housing numbers are based on outdated information, which leads to an unacceptable and irreversible impact on our natural heritage. The Local Plan must be re-drawn based on more recent information and with more respect for the Green Belt, Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC).
  
- 1 The Local Plan must define the practical steps necessary to meet the DBC declaration of a climate emergency, and lay out how DBC will contribute to the UK meeting our international legal commitments to reducing emissions. At present, the Local Plan admits to the options being put forward having a negative impact on climate targets, which is the opposite of what is legally and morally

The revised Local Plan must be based on evidence that is itself subject to public scrutiny. The current plan relies on aspirational growth strategies<sup>1</sup> and has led to a bias in the plans which must be addressed.

We would also like to draw your attention to the proposals for the Berkhamsted Civic Centre as put forward by B-Hive. The Civic Centre has been recognised as an Asset of Community Value, and we hope that you recognise that it is not merely an asset for DBC to extract revenue. The proposals outline how more value can be derived from the area for the community and economy.

We would like to thank you again for the opportunity to respond to this consultation. We look forward to DBC taking account of all the points raised, and would like to offer our help in forming your response to your declaration of a climate emergency in order to inform the revised Local Plan.

Yours faithfully

John Bell, Emma Norrington, Dan Parry, Wendy Conian, Emma Sherrington, Claire Mistry, Bridget Wilkins Transition Town Berkhamsted Steering Group

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14679
<b>Person ID</b>	1270739
<b>Full Name</b>	HELEN OSBORNE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure or 16.596 homes or the basis of its calculation can be relied upon to be robust. Subsequently the policy requirement to deliver 2.700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (" Changes in the Current Planning System" of August 2020) prepared In this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use or guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of ' need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and</p>

infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment or brownfield sites or by way of consideration of Increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14689

**Person ID** 1270740

**Full Name** JOHN OSBORNE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure or 16.596 homes or the basis of its calculation can be relied upon to be robust. Subsequently the policy requirement to deliver 2.700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (" Changes in the Current Planning System" of August 2020) prepared In this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use or guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of ' need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment or brownfield sites or by way of consideration of Increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p>

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14699

**Person ID** 1270752

**Full Name** DOUGLAS CANNON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to iustify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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Communities and Local Government advice justified by the White Paper (" Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional

intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

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Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Herner Hempstead.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14711

**Person ID** 1270753

**Full Name** ANNE PIKE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

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Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead. I

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

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<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14728
<b>Person ID</b>	1207558
<b>Full Name</b>	Ms Jane Barnett
<b>Organisation Details</b>	Director Savills (on behalf of Taylor Wimpey)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>1. <i>Dacorum's Local Plan will make provision for the following in the period between 2020 and 2038:</i></p> <p>a. <i>A minimum of <b>18,414</b> <del>16,596</del> homes.</i></p> <p>.....</p> <p>2. <i>The primary focus of strategic growth and investment will be at Hemel Hempstead <b>and Berkhamsted</b> supported by growth at <del>Berkhamsted</del> and Tring and then the larger villages of Bovington, Kings Langley and Markyate. Elsewhere large scale development will be restricted outside of the towns in large villages.</i></p> <p>3. <i>The majority of new growth and investment will be concentrated in sustainable locations as follows;</i></p> <p>.....</p> <p>b. <i>Berkhamsted will accommodate growth of at least <b>2,236</b> <del>2,200</del> new homes. <b>New</b> development will enhance the town centre and strengthen its function as a <b>Strategic Settlement and</b> key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.</i></p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14729
<b>Person ID</b>	1207558
<b>Full Name</b>	Ms Jane Barnett

<b>Organisation Details</b>	Director Savills (on behalf of Taylor Wimpey)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>As detailed in Sections 2 and 3 of Savills' Planning Document (February 2021), the draft Plan also identifies housing needs on the basis of the draft new Standard Methodology (SM2). However, the Government has since confirmed it does not intend to proceed with SM2 and instead, published a reformed standard methodology (SM1.1). For DBC, this essentially reverts back to the SM1 approach.</p> <p>On this basis, the housing need figure needs to be amended to reflect SM1.1 which accords with the needs identified in the South West Herts Local Housing Needs Assessment ('LHNA') (September 2020) and appropriately plan for 1,023 homes per annum (18,414 homes over the plan period) rather than 922 per annum (and 16,596 homes over the plan period) as drafted at present.</p> <p>It is recommended that the minimum housing target for Berkhamsted is identified at 2,236 units (to 2038) to ensure consistency with draft SP20 (sub clause 1) and as identified within the LHNA. Further commentary on this provided at Section 4 of Savills' Planning Document (February 2021). Such a change is considered necessary to ensure the new Local Plan can be considered to be positively prepared in meeting the NPPF tests of soundness and justified.</p> <p>As detailed in Savills' Planning Document (February 2021), Berkhamsted is a market town which performs a district role and is of a larger scale with a different function when compared to Tring. It therefore provides an opportunity for significant growth alongside Hemel Hempstead which as the focus for development over the last plan period has reached a certain "saturation point". Berkhamsted can alleviate some of these existing pressures and contribute to a more balanced approach to growth as sought through the new Local Plan. It is therefore recommended that Berkhamsted is identified as a "Strategic Settlement" alongside Hemel Hempstead and that this is recognised through the Settlement Hierarchy set out under draft Policy SP3 (as per the comments below).</p>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14743
<b>Person ID</b>	1270760
<b>Full Name</b>	LQ Estates
<b>Organisation Details</b>	LQ Estates
<b>Agent ID</b>	1270759
<b>Agent Name</b>	Miss Hanna Mawson
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>4.1 SP2 sets out that during the plan period to 2038 the Council will deliver a minimum of 16,596 dwellings. This is based on the Standard Method figure consulted upon by the Government of 922 dwellings per annum. The Government has subsequently confirmed that this Standard Method will not proceed and has reverted back to the Standard Method based upon the 2014 SNHP which produces a figure of 1,023 dwelling per annum for Dacorum Borough. The minimum requirement for the plan period should therefore be 18,414 dwellings and should be stated in this draft policy.</p> <p>4.2 The draft policy sets out the spatial strategy with the primary focus of strategic growth at Hemel Hempstead, supported by growth and Berkhamstead and Tring and then larger villages. It goes on to apportion the housing requirement between the identified settlements; over 10,600 new dwellings at Hemel Hempstead, at least 2,200 new dwellings at Berkhamstead and at least 2,700 new dwellings at Tring. This aligns with the Vision for each of the three main settlements and is carried through to the Settlement Hierarchy and Delivery Strategy for each settlement set out later in the Plan. This approach is generally supported.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14784
<b>Person ID</b>	1142710
<b>Full Name</b>	Mr Chris Stoneman
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy. Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing Communities and Local Government advice justified by the White Paper (“ Changes in the Current Planning System ” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for determining the level of ‘need in an area.</p> <p>It is only after consideration of the level of ‘need’ alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the string protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration increasing density of available sites. Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside if it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p> <p>The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamsted, Bovingdon, Kings Langley and Markyate – this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would</p>

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14795

**Person ID** 1270798

**Full Name** SAYED BEL-BAROO

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

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**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14810

**Person ID** 1264510

**Full Name** Martin Evening

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>8. The DLP 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 Dacorum Growth &amp; Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan.</p> <p>9. The Dacorum DLP 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 to residential use. This creates a windfall provision of housing throughout Dacorum. Looking at Brownfield Land would also realise local enhancement of the existing build environment. This would reduce the need to develop on Greenbelt Land.</p> <p>10. The DLP assumes that large areas of greenbelt 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 projection. 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 if there is any doubt about the future viability of the Garden Communities project as a whole</p> <p>11. Nearly all the development proposed in the Dacorum DLP will be on Greenbelt Land. This is against Government Policy. Living in (address removed) the land between Shooters way and the A41 has always been considered as the "Green Lung" for Berkhamsted, absorbing vehicle emissions and noise from the A41. Traffic has increased significantly in recent years, which means this Green Buffer is needed more than ever.</p> <p>Berkhamsted lies along a valley with most residential areas along the bottom and up the sides and air pollution naturally collect in the area. Air quality is borderline in many parts of town, Northchurch has had additional monitoring for several years as air quality is so poor. Excessive developments will result in poorer air quality. It is also noted that 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. Health and well-being are paramount to our communities.</p> <p>I strongly urge DBC to reconsider the current proposed DLP</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14813
<b>Person ID</b>	1270802
<b>Full Name</b>	Mr Edward Blogg
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<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 &amp; 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 &amp; 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>
<b>Included files</b>	

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14821
<b>Person ID</b>	1270804
<b>Full Name</b>	Dr Jessica Field
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (Changes in the Current Planning System of August 2020) prepared in this regard in 2020. It appears that the Council s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set</p>

out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council s inner settlement plans and their assessment of housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14835
<b>Person ID</b>	325470
<b>Full Name</b>	Gardener Family Trust
<b>Organisation Details</b>	Gardener Family Trust
<b>Agent ID</b>	1270807
<b>Agent Name</b>	Mr Alistair

	Brodie
<b>Agent Organisation</b>	Henry H Bletsoe & Son LLP
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>It is acknowledged that the release of new housing sites on the edge of Hemel Hempstead will require land to be taken out of the Green Belt. Such sites also need to be selected in locations which maintain separation between settlements and maintain the distinctive character of the settlements, whilst avoiding coalescence.</p> <p>At paragraph 5.4, the strategy acknowledges that the expansion of the town will be focused to the north and east of Hemel Hempstead "with further land removed from the Green Belt to meet longer term needs". We are concerned that the large sites currently proposed for development, to the north of Hemel Hempstead, risk placing too many eggs in one basket and, owing to their scale, will take many years to come forward through the planning system.</p> <p>At policy SP2 paragraph 3 (a) we acknowledge and support the level of growth proposed for Hemel Hempstead but would urge the allocation of more small to medium sites, which would provide diversity of choice and allow the quicker delivery of housing.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14877
<b>Person ID</b>	1144629
<b>Full Name</b>	Mrs SOPHIE LAWRANCE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<b>First</b> , a number of the Sustainable Development policies are not in fact borne out in the proposed site allocations contained elsewhere in the Plan. The nature and location of the site allocations is such that a number of the policies will not be met, or run directly counter to the policies.

**Second**, a number of the policies are not agreed because they place too little weight to DBC’s obligations under the NPPF to protect the Green Belt and preserve Green Belt boundaries to conserve and enhance AONBs and to protect and enhance biodiversity – relevant to, for example, the impact that the proposed level of housing growth in the area will have on protected chalk streams.

This is the case with Policies **SP2** (“Spatial Strategy for Growth”) and **SP3** (“The Settlement Strategy”). These policies are based on a fundamental misunderstanding of paragraph 11 of the NPPF, i.e. that a planning authority must “*make every effort to meet the housing, business and other development needs of an area*”<sup>7</sup>. This is not what paragraph 11 of the NPPF says. The obligation in paragraph 11 is subject to very significant qualifications in relation to (inter alia) Green Belt land and Areas of Outstanding Natural Beauty.<sup>8</sup> DBC’s misunderstanding of this fundamental point creates grounds for judicial review of the Plan and/or review under the Town and Country Planning Act.

7 Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth, page 35

8 NPPF, paragraph 6(d)(i) and footnote 6.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS14879

**Person ID** 1144629

**Full Name** Mrs SOPHIE LAWRANCE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

DBC's plan involves unprecedented destruction of Green Belt land, in particular around the market town of Tring, the market town of Berkhamsted and the village of Northchurch. 18 distinct Green Belt sites within the borough, representing 850 hectares of Green Belt land/other green space would be given up to the construction of over 16,500 new homes, increasing housing in the borough by over 25%. Many of those sites will impact on the Chilterns Area of Outstanding Natural Beauty (**AONB**) and on wildlife and the natural environment more generally.

One has to question whether DBC is fulfilling its obligation under the NPPF to protect the Green Belt, the boundaries of which "*should only be altered where exceptional circumstances are fully evidenced and justified*".<sup>9</sup>

The main justification for proposing to release such large areas of land from the Green Belt appears to be the numbers of houses required for Dacorum to build per year, as assessed under the government's 'standard methodology'. Yet the methodology appears to run counter to the NPPF and leads to perverse results: Dacorum - an area with no large hospital or arts venue - has a higher assessed housing need than large cities such as Hull, Stoke, Reading or Wolverhampton. By contrast, the Campaign For The Protection of Rural England Hertfordshire (**CPRE Herts**) has assessed that a more realistic estimate of Dacorum's annual housing need is between 351 and 536 per annum<sup>10</sup> – significantly fewer than the 922 dwellings per annum proposed in the Plan.

And - as noted above - the government itself has acknowledged the inevitable impact of the pandemic on housing requirements (for example, increased remote working may well mean that more brownfield sites become available for housing), and confirmed in December 2020 that "*meeting housing need is never a reason to cause unacceptable harm*" to the Green Belt.<sup>11</sup> Rather, the standard methodology provides only 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 [...] our strong protections for the Green Belt*".<sup>12</sup>

The approach adopted by DBC in its current consultation appears to 'put the cart before the horse' - sites are included within the Plan in order to meet the numbers, with the consequence that the sites are slated for release from Green Belt, rather than it being first decided whether any release of land from the Green Belt is warranted.

In fact, earlier rounds of independent evidence provided to DBC have given fuller and more proper consideration to the areas of Green Belt which could be released without undue harm.<sup>13</sup> It is notable that those reports have recommended only very modest incursions into existing areas of Green Belt, and recommend against many of the sites now being taken forward by DBC (e.g. Growth Areas Bk06 and Bk08, considered in more detail below).

It is important to note that those recommendations were not due only to concerns about encroachment on the openness of the countryside itself, but in a number of cases also related to the need to "*preserve the setting and special character of historic towns*" (purpose (d) of the Green Belt).<sup>14</sup> Berkhamsted and Tring, which are each set to grow by a huge 23% in the case of Berkhamsted, and a truly staggering 56% in the case of Tring,<sup>15</sup> are key examples of this. Adding a series of dormitory housing estates at a distance from town centres and public transport hubs, resulting in the vast majority of journeys needing to be made by car (as is the case with the proposed sites in Northchurch / to the South-West of

Berkhamsted - e.g. sites Bk06 and Bk08) detracts from that setting and special character. They are also contrary to other tenets of the NPPF, such as the need to ensure "*appropriate opportunities to promote sustainable transport modes*", to focus "*significant development on locations which are or can be made sustainable, through limiting the need to travel*" and to assess "*the environmental impacts of traffic and transport infrastructure*".<sup>16</sup>

By contrast to the initial independent reports on the Dacorum Green Belt, the latest assessments on which DBC relies, including that by AECOM, appear to have treated the existence of Green Belt protection as one among a large number of factors assessed for each site in order to determine whether it can be put forward for planning/the degree of constraints it faces. Treating the Green Belt as just part of a multi-factorial assessment does not meet the requirement to apply an "*exceptional circumstances*" test for releasing the land from its existing protections.

Similar considerations apply to the impact of many of the developments on the Chilterns AONB. DBC has a legal obligation to protect the AONB, yet a number of the sites selected are either in the Chilterns AONB, or are acknowledged to impact on it, e.g. due to "*intervisibility*" from the AONB itself.

One significant example of this is site Bk06 in Northchurch (to the west of Berkhamsted) which is visible from parts of Northchurch Common, i.e. the southern edge of the Ashridge Estate (an AONB) (see further on this site below). The NPPF requires that "*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*".<sup>17</sup> Dacorum's own currently applicable Adopted Core Strategy states that: "*development will not be supported where it has an adverse impact on the sensitive open valley sides and ridge top locations*".<sup>18</sup>

Further, the Chilterns Conservation Board (**CCB**) Management Plan 2019-24 states: states: "*A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority's legal duty towards the AONB applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). We have produced special advice in a Position Statement on Development Affecting the Setting of the Chilterns AONB. The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary*".

DBC is thus under a legal obligation to take account of (and not only pay lip service to) paragraph 172 of the NPPF (cited above) and to the CCB Management Plan when designing local plans which are within or which affect the Chilterns AONB. More generally, it is noted that DBC's proposals come at a time when the Glover Report (commissioned by DEFRA, 2019) has recommended that the Chilterns AONB should become England's next National Park, making development which adversely affects the area at odds with national policy.<sup>19</sup>

9 NPPF, paragraph 136.

10 CPRE Herts review of the Plan, <https://www.cpreherts.org.uk/planning/local-plan-responses/item/2645-dacorum-proposed-local-plan-has-unnecessarily-high-impact-on-the-green-belt>

11 Government December 2020 housing need consultation outcome.

12 Government December 2020 housing need consultation outcome.

13 South West Herts Green Belt Review, 2013, report prepared by Sinclair Knight Merz for DBC, together with St Albans City and District Council and Welwyn Hatfield Borough Council (SKM Report); Dacorum Borough Council Stage 2 Green Belt Review and Landscape Appraisal Report, December 2016, report prepared by Arup for DBC (Arup 1 Report). (The second, more recent, report by Arup followed DBC's decision as to its preferred site allocations, and so has a different purpose, focussed on the revised Green Belt boundaries and mitigation. Dacorum Borough Council Stage 3 Green Belt Review, Final Report (Arup 2 Report))

14 NPPF, paragraph 134.

15 Based on planned housing additions set out in the Dacorum Local Plan Emerging Strategy for Growth 2020-2039, and on current housing stock as at 2019, as reported in the Housing Policy Background Topic Paper, November 2020; para 4.7, p.27.

16 NPPF, paragraphs 102 - 104

17 NPPF, paragraph 172.

18 Dacorum Adopted Core Strategy, 2013, paragraph 21.6, p.160.

19 DEFRA Landscapes Review, final report; [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/833726/landscapes-review-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf)

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14883
<b>Person ID</b>	1144629
<b>Full Name</b>	Mrs SOPHIE LAWRANCE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>Policy SP2: It is not agreed that Berkhamsted and Tring should play a "<i>much greater role in delivering growth in the borough</i>":28 this proposal is not supported by the need to increase infrastructure and local employment opportunities which are largely either focussed on Hemel Hempstead or expected to take place outside the borough. As noted above this policy is inconsistent with the protections to the Green Belt set out in the NPPF.</p> <p>28 Dacorum Local Plan Emerging Strategy for Growth 2020-2039, paragraph 5.2, p.30.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14915
<b>Person ID</b>	1270836
<b>Full Name</b>	Tully Children's Fund
<b>Organisation Details</b>	Tully Children's Fund
<b>Agent ID</b>	1270837
<b>Agent Name</b>	Sav Patel
<b>Agent Organisation</b>	Associate Director Strutt & Parker
<b>Yes / No</b>	
* Yes	
* No	
<b>Spatial Strategy for Growth comment</b>	<p>Focusing on the spatial strategy for housing growth, the ESG places a significant reliance on large allocations on the outskirts of the main settlements, such as Hemel Hempstead, with “support” being provided for town and villages to deliver sufficient growth to provide much needed investment.</p> <p>Policy SP2 (Spatial Strategy for Growth) of the ESG identifies provision for a minimum of 16,596 new homes; no net loss of office floorspace from 2025; a net floorspace increase of 116,500sqm of industrial floor space; additional retail floorspace; and associated infrastructure to support these areas of In order to achieve these ambitious growth targets, particularly housing and employment, the growth strategy would need to deliver 922 homes per annum over the plan period. The main concentration of new housing and employment space is proposed to be allocated on the outskirts of Hemel Hempstead. Hemel Hempstead will accommodate at least 10,600 new homes, almost 65% of the Borough's total forecast housing supply.</p>

Paragraph 73 of the NPPF sets out that importance of ensuring the choice and competition for land. However, the provision of 65% of dwellings in and around one settlement is not likely to provide choice and competition for land. Secondly, this approach is unlikely to meet the objectively assessed housing needs for the Borough as a whole, with an over- provision within Hemel Hempstead and an under-provision within other key towns and villages within This situation is likely to be further exacerbated by the proposed urban extension to the east of Hemel Hempstead, which is within St Albans City & District jurisdiction.

The main proposed housing allocations are in Hemel Hempstead (10,600), Berkhamsted (2,200) and Tring (2,730), placing the vast majority of the total growth in Dacorum in just three locations. The reliance on these sites will require significant upfront infrastructure works before housing development can be started. A similar growth strategy was used in the neighbouring District of St Albans without success.

The Inspectors for the St Albans City & District Local Plan recently (November 2020) raised significant concerns regarding the soundness of the plan, resulting in its The Inspectors, amongst other things, raised concerns with the Council's focus on accommodating its housing needs using primarily large strategic sites, particularly given the significant infrastructure requirements relating to larger sites. The Inspectors were particularly concerned that insufficient consideration had been given to the allocation of small to medium sized sites in order to meet the Council's housing requirements in the short to medium term.

Similar issues were raised in respect of the Uttlesford Local Plan, which in 2020 was found to be unsound on the basis that it was considered by the Planning Inspector to be highly ambitious, containing three new Garden Communities (Easton Park, North Uttlesford and West of Braintree). The Inspector provided clear concerns regarding a) the infrastructure required to deliver these communities and b) the lack of a robust viability appraisal to demonstrate that the Garden Communities were deliverable.

There was a clear recommendation within both of these recent Local Plan decisions of the need to allocate smaller to medium sized sites, as required by paragraph 68 of the Small to medium size sites have the ability to deliver housing faster due to the reduced infrastructure needs and associated costs, thus providing a vital conveyor belt of housing to maintain the supply in the short term.

However, despite the well documented shortcomings of both the St Albans City & District Local Plan and Uttlesford Local Plan, Dacorum appear to be taking a very similar The Dacorum Local Plan is predicated on the delivery of North Hemel Garden Community (5,500 dwellings), Berkhamsted Urban Extension (1,870 dwellings) and Tring Urban Extension (2,200 dwellings). Between these three allocations, they will deliver some 9,570 dwellings, which is just over 60% of the total dwellings required over the plan period.

This clearly places an over-reliance on a limited number of strategic sites. If one or more of these sites were not capable of being delivered due to the extensive infrastructure costs associated with sites of this size, Dacorum would be in a position whereby they may be unable to meet their housing requirements, particularly within the early years of the plan. This approach is considered to be in direct conflict with paragraph 73 of the NPPF.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14930
<b>Person ID</b>	1270839
<b>Full Name</b>	EMMA WELLER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper (“Changes in the Current Planning System” of August 2020) prepared in this regard in 2020. It appears that the Council’s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional</p> <p>intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and</p>

infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14942
<b>Person ID</b>	1270499
<b>Full Name</b>	Hertfordshire County Council Property
<b>Organisation Details</b>	Property Team
<b>Agent ID</b>	1263792
<b>Agent Name</b>	Ms

	Claire Newbury
<b>Agent Organisation</b>	Senior Associate Vincent and Goring
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<b>Presumption in Favour of Sustainable Development</b> DBC seeks to deliver sustainable development in accordance with the NPPF, which includes concentrating the bulk of growth to deliver both new housing and employment within the three main towns within the Borough. HCC supports this approach, and the greater role that Tring will play in delivering the necessary growth.  HCC supports the overall spatial strategy and the Borough's step change in the level of housing growth required by Central Government, including the identified growth at Tring. It is recognised that Tring has a number of constraints, most notably in relation to local character, landscape and ecological features, and the ESG seeks to address these, whilst meeting this step change in housing delivery. The Council also recognises that the provision of housing requires the necessary infrastructure to support it. HCC wishes to work with DBC to deliver this infrastructure.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS14968
<b>Person ID</b>	1207224
<b>Full Name</b>	Chris Padley
<b>Organisation Details</b>	Environment Agency
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	5.2 – Your strategy principle 'Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites' should include minimising the requirement for development within the flood plain.

- This section should mention avoiding directing significant development within the floodplain as this also causes multiple issues:
  - Flooding causes significant congestion for roads in flood zones
- Causes negative impacts on the economy e.g. business being shut after a flood, damage costs to property/possessions average of £30,000 for homeowners, people not being able to travel to work/schools etc.
- Flooding also has negative long term effects on mental health such as PTSD and depression which can last up to two years after the flood

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15012

**Person ID** 1270845

**Full Name** DOMINIC LAWRANCE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Policy SP2, and the proposed local plan as a whole, are flawed, and vulnerable to challenge, on the following grounds:

(a) **The assessed housing need figure on which the proposed local plan is based is not fit for purpose as a guide to actual housing need in the borough over the next 17 years.** Although based on relatively recent ONS statistics, the housing need figure used by DBC has been rendered unsafe by recent events, in the form of Brexit and the covid 19 pandemic. These events are having significant effects on population levels, especially in the south of England, and are likely to have long-lasting impacts on housing need.

(b) **The policy, and the proposed local plan as a whole, do not adequately reflect DBC’s obligations under the NPPF to protect the Green Belt and preserve Green Belt boundaries, to conserve and enhance Areas of Outstanding National Beauty, and to prevent the loss or deterioration of irreplaceable habitats.** There are indications

in the plan that DBC has failed to understand these obligations. DBC seems to have treated the assessed housing need figure as a target that needs to be met, whatever the environmental costs. That approach indicates a fundamental misunderstanding of the “presumption of sustainable development” in the NPPF.

These points are explained and expanded upon below. They go to the heart of the plan.

**(a) DBC’s assessed housing need figure is not fit for purpose as a guide to actual housing need**

The plan is predicated on an assessment of housing need based on 2018 data, used as input for the officially sanctioned “standard method” algorithm. Obviously, these data were obtained before Brexit and before the covid 19 pandemic: phenomena which have had a substantial, and quite possibly lasting, impact on UK population levels and housing demand.

An ESCOE report published last month indicates that, comparing July-September 2019 with July-September 2020, the population of the UK may have fallen by as much as 1.3 million individuals, with much of that reduction occurring in London. The report notes that “if this is even close to being accurate, this is the largest fall in the UK resident population since World War 2.”[1] The apparent exodus of EU nationals and other non-British nationals from the UK in connection with Brexit and the pandemic have been commented upon by, inter alia, the Financial Times.[2]

In addition, it is widely recognised that the covid 19 pandemic has had a catalytic effect in changing lifestyles and working patterns, which might otherwise have taken longer to develop. It is clear that, to some degree, homeworking has been normalised, and that this will have a significant long-term impact on where and how people work, and on the amount of real estate within towns and cities that is required for the provision of office space. It seems highly likely that a proportion of the land that is currently taken up by business premises will be converted to residential or other use. However, there is of course also a possibility that, liberated from the need to commute to city centres on a daily basis, individuals who currently live in suburbs or close to cities will choose to live further afield. The point is that, at this time, it is impossible to say.

**Given the scale of population change in the last couple of years, due to Brexit, and the widespread acceptance that the covid 19 pandemic will accelerate social changes that might otherwise have taken decades to occur, it is impossible to have confidence that DBC’s assessment of housing need in the borough, based on pre-Brexit and pre-covid data, will bear any resemblance to real housing need over the next 17 years.**

This is not, of course, to say that it is futile to try and assess housing need over this sort of timescale. The NPPF requires such forward-looking assessments to be made. However, the question is whether now is the right time to be attempting

this task, given the very serious and potentially irreversible consequences of getting it wrong. There is a powerful argument in favour of waiting a couple of years until the dust has settled on Brexit, the pandemic has been controlled, and we have a clearer picture of population trends. To do otherwise is simply reckless.

**(b) DBC has failed to understand the presumption of sustainable development, and the importance of its obligations to protect the Green Belt, the AONB and irreplaceable habitats**

Even if it is accepted that DBC's assessment of housing need is objective and reasonable (and this is not accepted, for the reasons given above), policy SP2 and the proposed local plan as a whole are profoundly flawed, due to a failure to give appropriate weight to planning obligations to protect the Green Belt, the AONB and irreplaceable habitats. **The assessed housing need figure has been treated as a target to be met, regardless of the cost to the natural environment. That is quite wrong.**

Para 5.2 in the ESG (on page 30) states that the key principles behind the "spatial strategy for growth" include "*Delivering our requirement to significantly boost the housing supply ...*".

It is further stated at para 7.2 in the ESG that "*In considering the delivery of homes, the NPPF requires that planning authorities: make every effort to meet the housing, business and other development needs of an area (paragraph 11) ...*"

**These excerpts from the ESG are highly revealing. They seem to indicate a fundamental misunderstanding of what the NPPF requires, in terms of meeting housing and other needs, where the supply of unprotected, brownfield land is constrained.**

It is instructive to compare DBC's paraphrase of paragraph 11 of the NPPF with what that paragraph actually says. It reads:

*"11. Plans and decisions should apply a presumption in favour of sustainable development.*

*For plan-making this means that:*

- 1 a) *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*

- 1 *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 [footnote 6]; 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...*

Footnote 6 refers to policies relating to, *inter alia*, land designated as Green Belt, Areas of Outstanding Natural Beauty, and irreplaceable habitats.

Thus, paraphrasing and abbreviating slightly, what the NPPF actually says is that objectively assessed housing need must be met, unless:

- Other policies of the NPPF regarding the protection of, *inter alia*, the Green Belt, Areas of Outstanding Natural Beauty or irreplaceable habitats provide a strong reason for restricting development; or
- Meeting objectively assessed housing need would demonstrably not be beneficial in the round, taking account of other policies in the NPPF.

**Read carefully, paragraph 11 does NOT make meeting housing need an overriding objective which trumps other NPPF policies. It is clear that, where housing need can only be met through the taking of measures that violate other policies of the NPPF regarding the protection of valuable landscapes or habitats, the presumption of sustainable development is rebutted.**

The policies that are relevant in this case include:

- The policy regarding the Green Belt, contained in chapter 13 of the NPPF, which provides that “*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified*” (paragraph 136);
- The policy regarding Areas of Outstanding Natural Beauty, contained in chapter 15 of the NPPF, which provides that “*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*” (paragraph 172); and

- The policy regarding habitats and biodiversity, also contained in chapter 15 of the NPPF, which provides that “*development resulting in the loss or deterioration of irreplaceable habitats ... should be refused, unless there are wholly exceptional reasons*” (paragraph 175(c)).

**It appears that DBC has misunderstood its obligations under paragraph 11, and misdirected itself regarding how far it is required to go in meeting housing need.**

This is not simply a matter of “planning judgement”, i.e. a discretion given to the planning authority about how much weight should be given to interests or objectives which compete or are in conflict. **There is evidence here of a misunderstanding of the NPPF. Such misunderstandings of planning policy can be reviewed as unreasonable, on *Wednesbury* principles.** It has been held, in a planning context, that:

*“... A failure properly to understand and apply relevant policy will constitute a failure to have regard to a material consideration, or will amount to having regard to an immaterial consideration.”*[3]

The *Wednesbury* case itself makes clear that where considerations are required by a public authority to be taken into account as a matter of legal obligation, and they are not taken into account, the decision is vitiated.[4] In the present case, it appears that DBC has failed to note the derogations, in paragraph 11 of the NPPF, from the obligation to meet assessed housing need. The NPPF is express in requiring the points in paragraph 11(b)(i) and (ii) to be taken into account.

**The fundamental point here is that where housing need can only be met through the taking of measures that violate policies of the NPPF regarding the protection of valuable landscapes or habitats, which provide a strong reason for restricting development, the requirement to satisfy assessed housing need is overridden. DBC’s misunderstanding of planning policy here calls the proposed local plan into question, in its entirety.**

It is important to emphasise that the proposed plan’s non-compliance with the NPPF appears to go beyond the threat to the Green Belt and the Chilterns AONB. As noted above, the presumption of sustainable development is displaced if policies within the NPPF regarding the protection of irreplaceable habitats provide a strong reason for restricting development. Irreplaceable habitats are habitats “*which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity*” (NPPF, Annex 2).

**There is no definitive, exhaustive list of habitats that fall within this definition. However, a very strong case can be made for including chalk streams, such as the Bulbourne, Gade and Ver.** These habitats are internationally valued and extremely rare, and any species loss within them is likely to be permanent.

The proposed plan and the supporting documents recognise that these habitats are threatened by various risks; above all drought, due to the over-abstraction of water from the aquifers that feed them, to enable water to be provided to residents of the borough. If the population of the borough increases by roughly a quarter, it is obvious that in the absence of a more sophisticated means of providing water to households, the stress on the Bulbourne, Gade and Ver will be greatly increased.

However, although the proposed plan includes a policy on the protection and enhancement of the water environment, discussed below, this policy does not explain how additional water abstraction from the chalk aquifers is to be avoided. The policy looks like empty words. **It seems reasonable to conclude that DBC has no idea how the threat posed to the borough's chalk streams is to be mitigated, and has failed to do anything more than pay lip service to its obligation to protect these special habitats.**

[1] See the Economic Statistics Centre of Excellence, “Estimating the UK population during the pandemic”, 14 January 2021. Link: <https://www.escoe.ac.uk/estimating-the-uk-population-during-the-pandemic/>

[2] See the Financial Times, “How EU migrant exodus is reshaping communities across the UK”, 17 February 2021. Link: <https://www.ft.com/content/c837135e-60be-4ec6-ac14-78d500775222>

[3] *St Modwen Developments Ltd v SSCLG*, [2017] EWCA Civ 1643, para 6.

[4] *Associated Provincial Picture Houses Ltd v Wednesbury Corporation*, [1948] KB 223 at 228.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15031
<b>Person ID</b>	1270846
<b>Full Name</b>	PETER ATKIN
<b>Organisation Details</b>	ASSOCIATE
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><b>2.0</b> In light of Bovingdon’s sustainability credentials and the identified shortfall against housing requirements as proposed by the emerging Local Plan, the indicative target of 240 dwellings in Policy SP2 (Spatial Strategy for Growth) to be directed to Bovingdon is therefore considered to be low. This means that the emerging Local Plan has not planned positively or fully exploited the opportunities to achieve sustainable development at Bovingdon.</p> <p><b>2.1</b> As such, the new Local Plan should recognise the opportunities available to deliver additional development at Bovingdon in a sustainable way to help meet in full the Borough’s identified housing needs. Sustainable settlements such as Bovingdon are best placed to contribute positively towards the delivery of sustainable development and as explored further in these representations, land at Homefield represents an appropriate and deliverable site for allocation in the emerging Local Plan, consistent with the emerging Local Plan’s strategic objective for the distribution of new development across the Borough.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15037
<b>Person ID</b>	1250021
<b>Full Name</b>	Hallam Land Management Ltd
<b>Organisation Details</b>	Hallam Land Management Ltd
<b>Agent ID</b>	1265070
<b>Agent Name</b>	Stacey Rawlings
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	The Plan seeks to provide a strategy for delivering at least 16,596 new homes to the district over the plan period of 18 years. HLM agree that the spatial strategy should focus on the main town of Hemel Hempstead to accommodate the major part of its growth requirements.

**Draft Policy SP2** sets out the proposed spatial strategy allocating 10,600 of the new growth requirements to Hemel Hempstead (63% of total growth). This would increase the towns housing stock by circa 26% from 39,950 <sup>[Footnote 1 VOA 2019 Housing stock data]</sup> to c50,550 households. Given the strategic objectives, the focus on the town's sustainability credentials and its ability to deliver more sustainable forms of growth, HLM consider this should be a minimum.

The town is capable of accommodating a higher proportion of growth to 2038. Of the 5,945 additional homes to be delivered from Strategic Greenfield Growth Areas (36% of total growth), only 1,500 (9% of total growth) is proposed at Hemel.

The proposed approach to site selection relies upon a significant amount of new housing development being accommodated within the existing urban area of the town through urban site allocations and windfall sites (7,783 homes) along a first phase of a new Garden Community, known as Hemel Garden Communities (HGC). The Council consider HGC can contribute 1500/1550 new homes to 2038, with the balance of c4,000-4,500 homes being delivered in a future plan period from 2038 to 2050 through the safeguarding of land in the Green Belt to the north east of Hemel Hempstead. Two existing greenfield allocations from the adopted Core Strategy have been carried forward at Marchmont Farm (385) and West of Hemel (1,150) as these are yet to be delivered.

As part of HGC, a further 4,300 homes had been expected to be delivered through allocations in the neighbouring draft St Albans Local Plan (SALP) which has recently been withdrawn following examination. Work on a new SALP is due to commence shortly and cross-boundary growth will also be considered through the Joint West Herts Strategic Plan. In total, HGC is anticipated to deliver circa 11,000 new homes to the town and will be relied upon to deliver new housing to 2038 for the borough and well beyond.

At this stage in the plan-making process, HLM has two main concerns about the growth strategy for Hemel Hempstead. Firstly, the reliance upon a significant proportion of the growth requirements being delivered through the recycling of previously developed and underutilised land within the towns existing built-up area. Secondly, whether the first phase of HGC is properly justified on its own and can be realistically delivered in advance of a comprehensive allocation for the whole garden community area to be identified through the JSP/other Local Plans. These issues are set out below.

#### **Urban Growth Area Sites and windfalls:**

**Table 2 'Sources of Land Supply'** summarises the proposed distribution of development to 2038. This table emphasises the reliance upon Urban Growth Areas and Windfalls in delivering the strategy at 34% and 15% respectively.

The Urban Growth Area sites are expected to deliver in the early years of the plan to provide short- term flexibility and contingency while the larger planned Greenfield Growth Areas are coming forward. The reliance upon previously developed land is not helpful, particularly where sites are in active use and/or are part of a phased regeneration strategy. HLM consider at least 1,083 plots have been overestimated to be deliverable from this land supply source with many sites still in active use. Should these sites become available during the plan period, they would contribute towards the windfall allowance (**Table HLM1 at Appendix 2 - TABLE SHOWN BELOW**). Overall, there is insufficient evidence for the sites flagged in Table HLM1 which total 2,123 of the housing requirement. Many of these are located in Hemel Hempstead and may not deliver. This is a major concern given the role that the town is expected to play in achieving the sustainable

spatial strategy. HLM do not consider the Urban Capacity Study to be robust. The consequence of this is that it may not deliver a reliable source of housing land to the stated levels.

Site

Assumed delivery

Status

Commentary

H/2

National Grid

400

Allocation carried forward.

Site now cleared.

Requires further evidence on  
deliverability/intentions

H/8

233 London Road (Marlowes Garage)

10

12 flat scheme refused in 2008 on grounds of access, parking and density and  
garage still trading

Limited planning activity since 2008. Delivery uncertain

H/15

Miswell Lane, Tring

24

Refusal for 9 units in 2019 in grounds of inefficient land

No recent activity. Delivery uncertain. Should be counted in windfall  
allowance

H/19

Hicks Road, Marygate

13

In active use as a café/Horts motors/vacant shop

In active use – Delivery uncertain.

Should be counted in windfall allowance

H/20

Hicks Yard,

Watling Street

20

Site not progressed since

allocation for 10 units

Mu2

Hospital site

450

Previous allocation for 400 on whole site. Developable Site area reduced by 50% to 5ha. Overall capacity on smaller site increased to 450.

No Clear timescale from West Herts Hospital NHS Trust/CCG regarding site availability. Seeking to retain new hospital on site now – site allocation reduced but density assumption increased.

Unreliable – either reduce or

delete

Mu3

Paradise Industrial Estate

350

Previous allocation for 75 homes on part of site.

Capacity increased to 350

From an initial search the site is within 12 different land ownerships and is in active use (The Hub homeless centre; Co-op Funeral Services; Motorbike centre; MOT centre; National Demolition Training Centre; DP Redmad Ltd).

Hightown has developed infill plot for 22 AH units in 2018. No further activity. Undeliverable

MU4

Station Gateway

350

Previous allocation for 200  
units. Jan 2018 application  
There appears to be 5  
owners and the rail station

withdrawn for 435 flats. Application for 71 flats withdrawn in 2017.

car park. Given history and complex site issues, delivery is uncertain. Requires detailed evidence and justification to support re-

allocation

Mu9

Berkhamstead Civic Centre

16

DBC owned. Identified as not being available for next 5 years, possibly after.

In active use – Delivery uncertain.

Should be counted in windfall allowance

BERK11

Jewsons, Billet Lane

40

FZ2 and 3 and high SW flooding

Flood risk and in active use.

Should be counted in windfall

Hemel05

NCP Car Park, Hillfield Rd, Hemel

100

Leased to NCP car parks, enterprise rent a car and cancer research UK plus contains a Grade 2 listed mural

Part of town centre parking strategy 2013.

In active use – Delivery uncertain.

Should be counted in windfall allowance

Two Waters

Regeneration Site

350

Previous allocation carried forward. FZ2 land. Bulky goods retailers on site (B&Q/Vauxhall)

Agree that site requires regeneration and is a key strategy for DBC. However, the increase in capacity by 60 units from previous allocation requires further evidence as current site is not delivering. FZ2 land.

Complex regeneration site –

capacity increase requires detailed justification

Totals

2,123

Reduction of highlighted sites by 1,083 as a minimum. The delivery of these is uncertain and should form part of the 2,400-windfall allowance.

Other sites need clearer evidence to support allocation in principle and capacity assumptions

The risk of several sites not being released for development in the manner envisaged may affect the ability of DBC to give effect to its spatial strategy and demonstrate a 5-year housing land supply on adoption of the Local Plan which can then be maintained throughout the plan period.

The Council's evidence base needs to be strengthened to clearly demonstrate that these sites will be brought forward in the manner envisaged. To date, the SLAA does not provide sufficient clarity.

The high proportion of urban sites currently in active use require further evidence to support the delivery assumptions. The Councils approach to the intensification of existing allocations which are being carried forward must be properly evidenced, particularly where sites have been allocated for several years and are yet to obtain planning permission for alternative development. The 2019 NPPF definition of developable is that sites should have *a reasonable prospect that they will be available and could be viably developed at the point envisaged*. This includes delivering the target 35% affordable housing anticipated from these urban sites.

The Council has included a windfall allowance for Hemel urban area which is predominantly justified by evidence from past years supply from unallocated sites. The Council has undertaken a detailed assessment of possible brownfield sites and underutilised land which has led it to conclude that the growth needs of the borough cannot be met without the release of Green belt land, as part of its Exceptional Circumstances case. Sites that might otherwise have contributed

to windfall supply have been reviewed and identified for allocation. In light of this, HLM question whether historic levels of windfall supply can be sustained going forward.

To address any potential shortfall, contingency sites may need to be identified at Hemel Hempstead. On the basis that urban sites have been thoroughly assessed and included within the plan where relevant, further greenfield/Green Belt release at Hemel may be needed. This would ensure that the town remains the priority focus for new development to align with the Council's sustainable distribution of growth.

### **Hemel Garden Communities:**

HGC is anticipated to be the primary source of housing in the borough for the longer term extending well beyond 2038. Given the uncertainty of the Emerging Strategy for Growth to secure a longer- term approach, including reliance on a second round of plan-making within St Albans District and a future review of this 2038 Local Plan, there is currently no mechanism in place to ensure the delivery of the wider HGC to secure the Councils aspirations for transformational growth.

The Joint Councils of Dacorum Borough, Three Rivers, St Albans, Hertsmere and Watford have agreed to prepare a joint strategic plan (JSP), specifically to deal with cross-boundary growth requirements in South West Hertfordshire. HLM would expect the HGC to be planned and committed through the emerging JSP. This strategy can the flow into future Local Plan reviews. This is the correct mechanism to ensure that a holistic approach is secured, and the Garden Community principles are met.

A joint strategic plan can consider the most appropriate delivery strategy, Infrastructure Delivery Plan and trajectory expectations for HGC. The land is within several ownerships and requires significant new infrastructure including a new link road, primary and secondary education, employment and community infrastructure to deliver on its fundamental principles. The Council is not in a position to publish its key evidence base for HGC at this second Reg 18 consultation stage, thus highlighting the difficulties for respondents to comment. The consultation is premature in this respect. It is not possible to understand how a first phase of HGC could come forward in isolation, whether it can deliver the full policy requirements including 40% affordable housing provision and whether the anticipated housing trajectory for this site represents a realistic profiling.

The recent examination of the (now withdrawn) Uttlesford Local Plan in Essex has highlighted the extent of evidence relating to new Garden Community proposals that is required to demonstrate that a plan is sound.

The lack of detail currently available to support the Regulation 18 consultation highlights the potential difficulties of seeking to agree a first phase of a significantly larger garden community without any certainty of the remainder being allocated in a future development plan, including within the neighbouring district. This could potentially result in a protracted and lengthy local plan process. Any slippage in the Local Plan timetable runs the risk of the Council not having a 5YHLS for an extended period of time now that the Core Strategy is over 5 years old and the standard method of calculating housing land supply is in play (effectively doubling the annual housing delivery requirements).

HLM are also concerned that the plan is not clear. It states that it is only seeking to safeguard the HGC phase 2 land and remove it from the Green Belt to ensure that Green Belt boundaries are capable of enduring beyond the plan period

(NPPF 136). However, the plan appears to be apportioning an amount of development for the period beyond 2038 for 4,000-4,500 new homes without any detailed evidence to support this approach (Draft Policies SP15 and SP16 refer). This is a significantly higher scale of growth for HGC than the Council is actually proposing to deliver as a phase one by 2038. There is no certainty over the lead in time for phase one and what it needs to commit to in terms of strategic infrastructure and what is viable in the period to 2038.

The emerging strategy suggests that a step change in sustainable transport is a priority for DBC to include an ambitious modal shift through the HGC. HLM consider the infrastructure and transport improvements critical to support the spatial strategy should have been published as part of this consultation. Linked to the lack of cross-boundary co-ordination of these matters the draft Plan does not provide sufficient certainty that necessary infrastructure to support the provision for housing and jobs will be delivered. Further commentary is provided in the transport evidence section of this representation in response to Consultation Question 6.

**Market towns:**

HLM is also concerned that the scale of growth proposed at the two market towns of Berkhamstead and Tring are disproportionate, both in terms of the scale of development proposed and the amount of land that is proposed to be released from the Green Belt to meet this part of the strategy. The proposed allocations at these settlements combine to deliver 30% of the proposed total growth requirement to 2038.

The proposed increase in size of Berkhamstead (by 2,200 homes or 23%) and Tring (by 2,700 homes or 50%) by 2038 is substantial and transformational for both market towns. Taking the points mentioned above - HLM is concerned that the over-reliance upon urban sites for growth at Hemel Hempstead and potential delays and uncertainties over the delivery of a first phase of HGC - the development strategy is geared towards the delivery of new homes in the two market towns, not at Hemel. There is a risk that growth will not come forward at the main town as quickly, to the detriment of the overarching vision, strategic objectives and sustainability targets.

Some of the proposed allocations are within and close to the Chilterns AONB are clearly major development. We do not consider this approach aligns with the policy objective of ‘attaching great weight to conserving the landscape and scenic beauty of the AONB’ required under NPPF 172.

The scale of land proposed to be released from the Green Belt to deliver this amount of housing at the Tier 2 market towns is not justified at this stage. From a cursory review, the extent of land proposed for release appears far greater than might actually be required to deliver the stated growth levels, particularly at Tring.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15039
<b>Person ID</b>	1250021
<b>Full Name</b>	Hallam Land Management Ltd

<b>Organisation Details</b>	Hallam Land Management Ltd
<b>Agent ID</b>	1265070
<b>Agent Name</b>	Stacey Rawlings
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>Generally, there are inconsistencies between the proposed sources of supply and their aggregate capacity across different parts of the plan and different policies. This should be For example, HDC Phase 1 is proposed to yield 1500 homes and 1550 homes, depending which policy is applied. HGC Phase 2 changes from safeguarded land for 4,000 and occasionally 4,500 homes. A consistent approach is necessary.</p> <p>The level of growth proposed at Tring and Berkhamstead requires more evidence to support its proposals to properly demonstrate that this is sustainable growth and capable of creating a sustainable community.</p> <p>Policy SP2 should be updated to include at least one additional greenfield allocation at Hemel Hempstead to reflect a more realistic and balanced portfolio of sites that are available, achievable, and capable of delivering the required growth levels by 2038. This will ensure that Hemel is the key location for new housing delivery in the plan period and that the plan is sufficiently flexible to account for changing circumstances.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15055
<b>Person ID</b>	1270849
<b>Full Name</b>	Ms Jessica Lindfield
<b>Organisation Details</b>	St William Homes LLP
<b>Agent ID</b>	210999
<b>Agent Name</b>	Mr Martin Friend
<b>Agent Organisation</b>	Director Vincent & Gorbing
<b>Yes / No</b>	

<p>* Yes</p> <p>* No</p>	
<p><b>Spatial Strategy for Growth comment</b></p>	<p><b>Spatial Strategy for Growth</b></p> <p>St William support the overall spatial strategy, particularly the objective of significantly boosting housing land supply and maximising the amount of development on previously developed land. In particular, the recognition that this strategy will be taken ‘much further’ in Hemel Hempstead by “<i>encouraging substantial increases in heights and densities in the most accessible locations,</i>” recognising that Hemel Hempstead is the most sustainable location in the Borough, is particularly This approach must be fully recognised in the policy guidance for individual site allocations as highlighted in respect of our comments on site HH09 above.</p> <p>Generally, Policy SP2 reflects well this spatial strategy and is supported. The clear need to intensify development and make best use of land within Hemel Hempstead through increased heights and densities is established as a key feature of the Optimising the delivery of homes on previously developed land is also critical to ensuring that the level of Green Belt release is both minimised and justified. Moreover, the optimisation of previously developed land within Hemel Hempstead affords the greatest opportunity to co-locate development in close proximity to existing jobs, shops, education and other day-to-day services that can be accessed by modes other than the private car.</p> <p>It is noted that SP2 requires a minimum of 16,596 homes to be provided during the plan period. Leaving aside the actual number (we comment on this further below), St William welcome the recognition that the requirement must be a minimum and that exceeding this will have benefits in terms of affordability and sustainability. This approach should also be reflected in the individual site allocations by establishing minimum yields that can be exceeded by design-led development solutions.</p> <p>St William accept that the strategy will need to include strategic Green Belt It is important that the plan fully recognises the lead in timescales for such development and fully tests their viability given the infrastructure needed to support them. In most cases such development will not contribute to housing delivery in the first five years of the plan. This is a further reason why maximising delivery on previously developed land within the urban area is crucial to the successful implementation of the plan as such sites – including the National Grid site – are available in the short term and do not have significant infrastructure requirements.</p>
<p><b>Included files</b></p>	
<p><b>Title</b></p>	<p>Spatial Strategy for Growth</p>
<p><b>ID</b></p>	<p>EGS15067</p>
<p><b>Person ID</b></p>	<p>1205433</p>
<p><b>Full Name</b></p>	<p>Ms Jill Bayley</p>
<p><b>Organisation Details</b></p>	
<p><b>Agent ID</b></p>	
<p><b>Agent Name</b></p>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We believe the underlying analysis to be flawed, inconsistent and lacking in any material detail on key issues such as the environment, transport and infrastructure. We object strongly to the proposed plan and ask you Dacorum to reconsider.</p> <p>The plan appears to involve restricting the width of the already congested A 414 through Hemel to accommodate a new Mass Rapid Transit system to Harlow and other public transport initiatives. It suggests traffic coming from Tring and Berkhamsted would use the new link road in North Hemel from the Dagnall Rd B440 to J8 on to the M1 rather than go through Hemel using the A414.</p> <p>How is traffic from Tring and Berkhamsted supposed to access this new link road ask yourselves that question.</p> <p>To the north along Dagnall Rd is a SINGLE LANE WEIGHT RESTRICTION BRIDGE AT WATER END, already the site of frequent accidents. To the west is a road which passes through POTTEN END our wonderful village for how much longer we ask ourselves if this plan goes ahead, the route then descending into the narrow streets north of Berkhamsted, then via one of three single lane crossings of the railway sites of frequent accidents before arriving at the very congested crossroads in the centre of Berkhamsted.</p> <p>NO IMPROVEMENTS ARE PROPOSED to existing roads and there is no new link between the A41 and Dagnall Rd.</p> <p>It appears that Hemel's traffic problems are to be exported to Water End, Great Gaddesden, POTTEN END OUR VILLAGE and Berkhamsted. This is UNACCEPTABLE.</p> <p>'</p> <p>We will lose 2,000 acres of Green Belt this is also UNACCEPTABLE.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15068
<b>Person ID</b>	211454
<b>Full Name</b>	Mr Colin Bayley

<b>Organisation Details</b>	Retired
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>We believe the underlying analysis to be flawed, inconsistent and lacking in any material detail on key issues such as the environment, transport and infrastructure. We object strongly to the proposed plan and ask you Dacorum to reconsider.</p> <p>The plan appears to involve restricting the width of the already congested A 414 through Hemel to accommodate a new Mass Rapid Transit system to Harlow and other public transport initiatives. It suggests traffic coming from Tring and Berkhamsted would use the new link road in North Hemel from the Dagnall Rd B440 to J8 on to the M1 rather than go through Hemel using the A414.</p> <p>How is traffic from Tring and Berkhamsted supposed to access this new link road ask yourselves that question.</p> <p>To the north along Dagnall Rd is a SINGLE LANE WEIGHT RESTRICTION BRIDGE AT WATER END, already the site of frequent accidents. To the west is a road which passes through POTTEN END our wonderful village for how much longer we ask ourselves if this plan goes ahead, the route then descending into the narrow streets north of Berkhamsted, then via one of three single lane crossings of the railway sites of frequent accidents before arriving at the very congested crossroads in the centre of Berkhamsted.</p> <p>NO IMPROVEMENTS ARE PROPOSED to existing roads and there is no new link between the A41 and Dagnall Rd.</p> <p>It appears that Hemel's traffic problems are to be exported to Water End, Great Gaddesden, POTTEN END OUR VILLAGE and Berkhamsted. This is UNACCEPTABLE.</p> <p>'</p> <p>We will lose 2,000 acres of Green Belt this is also UNACCEPTABLE.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth

<b>ID</b>	EGS15088
<b>Person ID</b>	1261425
<b>Full Name</b>	Camilla Pascucci
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>1 The DLP 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 Dacorum Growth &amp; Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan.</p> <p>1 The Dacorum DLP 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 to residential use. This creates a windfall provision of housing throughout Dacorum. Looking at Brownfield Land would also realise local enhancement of the existing build This would reduce the need to develop on Greenbelt Land.</p> <p>1 The DLP assumes that large areas of greenbelt 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 projection. 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 if there is any doubt about the future viability of the Garden Communities project as a whole</p> <p>1 Nearly all the development proposed in the Dacorum DLP will be on Greenbelt This is against Government Policy. Living in (address removed) the land between Shooters way and the A41 has always been considered as the "Green Lung" for Berkhamsted, absorbing vehicle emissions and noise from the A41. Traffic has increased significantly in recent years, which means this Green Buffer is needed more than ever.</p>

Berkhamsted lies along a valley with most residential areas along the bottom and up the sides and air pollution naturally collect in the area. Air quality is borderline in many parts of town, Northchurch has had additional monitoring for several years as air quality is so poor. Excessive developments will result in poorer air quality. It is also noted that DBC are using an outdated Air Quality Action Plan from 2014-1018. Air quality has not improved since then and recently significantly, air pollution has been legally listed as a cause of death. Health and well-being are paramount to our communities.

I strongly urge DBC to reconsider the current proposed DLP

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15094

**Person ID** 1270925

**Full Name** Mrs Kathryn Salway

**Organisation Details** Extinction Rebellion Dacorum

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

Spatial Strategy for Growth

The plan must ensure adequate Social Housing, which is net zero in operation, as defined in our answer to question 1.

The plan must allow for an increase in electrically powered transport and roads must be designed to encourage walking and cycling.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15112

**Person ID** 1270934

<b>Full Name</b>	Mr Leonard Hussey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Due to the current coronavirus pandemic, more people are working from home. This will eventually lead to empty office space which could be converted into homes. This would alleviate the need for houses to be built on Green Belt.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15116
<b>Person ID</b>	1222814
<b>Full Name</b>	Alex MacGregor
<b>Organisation Details</b>	Senior Planner Quod Ltd (ON BEHALF OF PIGEON INV MAN LTD)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Pigeon Hemel Hempstead Ltd welcomes that Policy SP2 states that the primary focus of strategic growth and investment will be at Hemel Hempstead along with the recognition of the proposed growth to the east of Hemel Hempstead within St Albans District.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15126

<b>Person ID</b>	1270940
<b>Full Name</b>	
<b>Organisation Details</b>	CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Part 3(d) of <b>Policy SP2: Spatial Strategy for Growth</b> proposes that Bovingdon will accommodate some 240 new homes and, following discussions between BPC and the Borough during the development of the Emerging LP, and the conclusions drawn in the Interim Sustainability Appraisal in relation to the chosen Growth Option Ci which guides the Spatial Strategy in the LP, BPC is supportive of that level of new development as a maximum for the village as a whole over the Plan period to 2038.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15147
<b>Person ID</b>	1270945
<b>Full Name</b>	
<b>Organisation Details</b>	NORTHCHURCH PARISH COUNCIL
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Dacorum's Strategy is based out-of-date projections that do not reflect a true picture of housing demand. Since the projections were made in 2014, significant social and economic changes have reduced the need for dwellings in Dacorum.

The 2014 Household Projections: England, 2014-2039 Report acknowledges, on page 2, that their projections cannot predict changing circumstances:

“The assumptions underlying national household and population projections are based on demographic trends. They are not forecasts as, for example, they do not attempt to predict the impact of future Government policies, changing economic circumstances or other factors that might influence household growth.”

The Government acknowledges that circumstances have changed since 2014 when these projections were made. The recent Government response to the local housing need proposals states:

“Since we published the consultation, the way that the country lives, works and travels continues to change more rapidly than at any time since the war.”

In 2014 people needed to live near London to commute to work. This has changed. Even before Covid, surveys repeatedly showed that most employees want to work from home at least some of the time and over a third would take a pay cut in exchange. The experience of working at home, during Covid, has given workers and managers a taste of what could be. according to a report.

According to ‘The future of towns and cities post-Covid-19 report’ in January 2021 by the auditing firm KPMG, a permanent shift towards working from home and increased online shopping could cost more than 400,000 retail jobs on England’s high and vacant retail space. Microsoft, Facebook and Twitter have told staff that they will have the option of working from home permanently. On 23 February 2021, HSBC announced its intention to reduce its office space by nearly 40% to capitalise on new part-office-part-homeworking arrangements after the pandemic. As Global Workplace Analytics concludes: “The genie is out of the bottle and it’s not likely to go back in.”

<https://globalworkplaceanalytics.com/work-at-home-after-covid-19-our-forecast>

So, the 2014 projections are out-of-date and far too high. Even by 2016, the Office for National Statistics (ONS) were projecting far less demand for housing in Dacorum. By 2018 their projections had more than halved.

Dacorum’s Sustainable Development Strategy does not comply with the duty to protect the Green Belt under the National Planning Policy Framework (NPPF). It seeks only to protect the Chilterns AONB:

Policy DM27 - “Landscape Character and Chilterns Area of Outstanding Natural Beauty 1. All development shall help conserve, restore or enhance the prevailing quality, character and condition of Dacorum’s natural and historic landscape. 2. Permission for major developments in the Chilterns Area of Outstanding Natural Beauty (AONB) will be refused unless exceptional circumstances prevail as defined by national planning policy”.

Dacorum’s strategy fails to offer the same protection to the Green Belt. The paragraphs dealing with the Green Belt are concerned only with an intention to build on it:

19.7: “We have undertaken a review of the Green Belt and identified those areas on the edge of the main settlements where exceptional circumstances exist to release land for development or where other minor adjustments are necessary”.

“These proposed releases will make a significant contribution to meeting the long term housing and other development needs of the Borough. Green Belt land has been released to enable the delivery of the spatial strategy for Dacorum.”

In contrast, Dacorum’s previous strategy (2017) contained principles to protect the Green Belt:

10.2.2 “These cover the need to make the best use of brownfield land to maximise opportunities for urban regeneration”.

“National planning policy is also clear that Green Belt boundaries should only be changed in exceptional circumstances. The protection of the Green Belt from inappropriate development is an important national and local principle”.

10.2.3 “Another important principle is to ensure that our urban areas do not sprawl into other existing settlements undermining their distinct and separate identities. Likewise, isolated development which has poor connections with local services and facilities should be discouraged. Protecting the character of our town and villages, and that of important landscapes and countryside will also be important considerations, as will using development to help fund and deliver essential new infrastructure”.

In Dacorum’s new strategy, the “exceptional circumstances” required by the NPPF to build houses on Green Belt seems to consist of little more than, “because we want to build houses”.

The Bulbourne is a rare chalk stream: there are only 250 in the world and most are endangered. The river is a sanctuary for all kinds of wildlife and a source of biodiversity. Hertfordshire's State of Nature report 2019 by the Herts & Middx Wildlife Trust explains the importance of the River Bulbourne:

“Hertfordshire has a national and international responsibility for protecting its special chalk rivers, which have a unique ecology due to their clean, mineral-rich water and consistent flows. A high proportion of the world’s global numbers of chalk streams can be found in the South-East of England, specifically in Hertfordshire”.

The Bulbourne rises at Dudswell, and runs for 10km alongside the Grand Union Canal through Northchurch and Berkhamsted and joins the Gade at Two Waters, Hemel Hempstead. The Bourne Gutter, a winterbourne, periodically rises and joins it at Bourne End.

Chalk streams are beautiful, flowing crystal-clear over a gravel bed and supporting rich ecologies. Rainfall enters the river basin, works through the chalk strata and emerges via springs as crystal clear water. As this process takes months, the river level rises and falls slowly. However, abstractions for public water supply and for the canal have seriously depleted the quantity and quality of water in the Bulbourne. The Environment Agency recently concluded that unsustainable levels of abstraction for public water supply are contributing to low flows:

<https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039029890>

<http://dacenvforum.org.uk/wp-content/uploads/2019/03/DEF-EA-Presentation-21-Feb-2019.pdf>

The wetland features of the River Bulbourne are fragile and threatened by groundwater abstraction for domestic water. Houses in Northchurch, supplied with water pumped from the chalk aquifer, reduce the water available for the river. To avoid further abstraction from the chalk aquifer and further damage to the River Bulbourne, the proposed developments in Northchurch would require a new reservoir and water imported from other areas. These massive and expensive

infrastructure projects would not only take years but would also require additional land which Dacorum's Strategy has not identified.

The proposed new developments will also damage the quality of the water. Impermeable surfaces, such as roads, paths, roofs and carparks, mean that rainwater, rather than seeping through chalk, runs into drains which flow directly into the river causing it to rise and fall rapidly. Silt, rubbish, chemicals and effluent turn the river into a thick layer of dark, polluted silt and cause localised flash flooding.

Dacorum's Strategy has not considered the negative impact of water supply on the River Bulbourne. The proposed developments will cause irreversible harm to the quantity and quality of the water and its fragile wetland ecology.

### **2.3 Dacorum is not obliged to meet these 2014 figures**

The Government has made it clear that Councils are not compelled to meet these 2014 figures at the expense of their legal duty to protect the Green Belt and the environment:

“We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”

Dacorum's strategy conflicts with Government policy because it causes unacceptable harm to the Green Belt and to the River Bulbourne. It is, therefore, flawed and should be revised to meet current housing needs.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15171
<b>Person ID</b>	1270993
<b>Full Name</b>	MRS MERRIL TRUEEMAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation . The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the

existing settlement boundaries before land outside of it is considered . The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would

have on the area . It has not therefore been proven that the development could occur \-without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15181

**Person ID** 1270998

**Full Name** PAUL HARRIS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. **Neither the** housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council· s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a

requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

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Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15191
<b>Person ID</b>	1142578
<b>Full Name</b>	Mr Norman Brooks
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes with_in Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target <b>as a</b> requirement against market evidence, planning designations and policy, Government advice and by way of ' cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>'</p> <p>The target is broken down to 922 homes per annum, which the Council consider has' been derived from the Ministry of Housing.,</p> <p>Communities and Local Government advice justified by the White Paper ( ' Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number</p> <p>The</p> <p>despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with -a notional intention to decrease <b>a</b> increase the housing supply number on the outcome of further consultation. target does not present a requirement in plan making, but instead provides a starting point for the determining the level of'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned_ for the area concerned..</p>

There is a requirement for the Council to reassess their initial standard method housing target, but there' is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

to

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the

existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as

was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining

requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council's inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15203

<b>Person ID</b>	1264623
<b>Full Name</b>	Judy Chaussalet
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><u>Green Belt</u>: The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open - a sustainable development strategy would protect the Green Belt for future generations. This is critical to the health and wellbeing of local inhabitants directly and indirectly. This Local Plan is not sustainable in any meaningful sense and needs to be revised.</p> <p>“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.” National Planning Policy Framework update 24 July 2018</p> <p>The council has chosen out-of-date data to generate its housing figures. The impact of coronavirus on working patterns and office space have not been considered. Even were housing targets to be revised down, the council has not shown “fully evidenced and justified” exceptional circumstances</p> <p>to release Green Belt land. Nor have “all other reasonable options for meeting its identified need for development” been explored.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15204
<b>Person ID</b>	1271003
<b>Full Name</b>	Thierry Chaussalet
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><u>Green Belt</u>: The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open - a sustainable development strategy would protect the Green Belt for future generations. This is critical to the health and wellbeing of local inhabitants directly and indirectly. This Local Plan is not sustainable in any meaningful sense and needs to be revised.</p> <p>“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.” National Planning Policy Framework update 24 July 2018</p> <p>The council has chosen out-of-date data to generate its housing figures. The impact of coronavirus on working patterns and office space have not been considered. Even were housing targets to be revised down, the council has not shown “fully evidenced and justified” exceptional circumstances</p> <p>to release Green Belt land. Nor have “all other reasonable options for meeting its identified need for development” been explored.</p>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15213
<b>Person ID</b>	1264623
<b>Full Name</b>	Judy Chausalet
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>This plan will create housing but will destroy great swathes of countryside, and valuable habitats without regard for the long-term impacts.. 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</p>

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15214
<b>Person ID</b>	1271003
<b>Full Name</b>	Thierry Chausalet
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	This plan will create housing but will destroy great swathes of countryside, and valuable habitats without regard for the long-term impacts.. 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
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15239
<b>Person ID</b>	1145136
<b>Full Name</b>	Mr Garrick Stevens
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

## Spatial Strategy for Growth comment

I recognise that the Borough is being required by the Government's dictat to contribute a share of the dwellings believed to be needed to achieve its house building target of 300,000 dwellings per annum [dpa]. As a result, the Borough has published a Reg18 Plan that shows a distribution of dwellings across the major settlements that will dramatically change them and the landscape as this will also require a substantial [756 ha] re designation of Green Belt land for development.

If the Draft Plan is taken forward and meets the approval of the Planning Inspectorate following the Examination in Public, the protection of the Green Belt land so released will have been lost or compromised [at best] should development on these sites not match the major house builders' appetite for development in the time frame envisaged. I am proposing the Borough adopts a different strategic approach:

- 1 Adopt numbers of housing provision that is needs based, starting from the latest **2018 ONS** projections.
- 1 Provides for 5-10 year land availability, with minimal if any re-designation of Green Belt, which should be restricted to genuinely sustainable locations.
- 1 Commits to review the Borough Plan and land allocation in the 5 year time frame determined by MHCLG, by when there will be less uncertainty of the numbers of dwellings being built or adapted in offices and the town centres as buildings are re purposed post Covid-19.
- 1 Defers large scale allocation of Green Belt/Growth land in light of 3
- 2 Progresses the plans for Hemel Garden Community with St Albans

The extant Adopted Core Strategy [2013-2030] set out an annual build rate of 430 pa. Apart for relatively minor amendments, this recognised the constraints of the Borough which includes a high proportion of Green Belt or AONB. Since then, with Government pressing for greater house building numbers, there is also a requirement to identify land supply of 5yrs [and more recently beyond 10 years], which results in further demand for land to be identified for future development. It is one thing to face demand based on 430 dpa, quite another at over 1023 dpa.

Historical data shows that the Borough's 'windfall' developments have contributed a significant proportion of the annual increase in dwellings.

In a post COVID-19 scenario, it is uncertain whether town centre properties will continue to be viable as shops or department stores. Conversions of such properties is likely to add to 'windfall' numbers once land-owners come to terms with the new opportunities.

Our residents expect Councillors and Officers to develop evidenced based policy; we rely on policy makers to be properly grounded on the issues. The following table sets out the different sets of annual house building numbers that are being considered in proposing the strategy set out in this paper.

Arguably the most objective dataset comes from the base ONS tables – notwithstanding any reservations one might have about uncertainty or reliability of the data.

The principal conclusion is that the projected annual building number based on the 2018 data is 355 dpa. If the Ministry insist on the application of the 'Standard method' the number calculates as 497dpa. I recognise this conflicts with the

numbers arising from the standard method posited by MHCLG of 1023 dpa based on the contentious out-dated 2014 ONS projections which many consider as flawed as a basis to develop policy for the coming decades.

Table 2 of the Draft Plan [p37] shows total commitments at 2708 and Urban Growth Areas at 5638, with Grovehill Neighbourhood Plan contributing 200 to what could be considered as current Urban Capacity of 8,546 dwellings. Without relying on windfall contributions, and adopting say 500 dpa as representing the assessed needs, urban capacity availability is in excess of the first 5-10 years requirement for land availability.

This leads to the judgement that it is feasible to consider adopting the 'target' of 500 dpa over the coming period which together with the projected windfall appears to provide numbers of dwellings, including affordable homes, that will be in excess of the 2018 ONS projections for assessed need.

This will allow the Borough to defer release of Green Belt land in the foreseeable period other than for relatively minor adjustment such as at Hanbury in Berkhamsted following the last EiP.

The Government's ambition to build 300,000 dpa is laudable given the shortage of housing especially of truly affordable housing viz. housing for 'social rent'. The nation has not built in such numbers for over 40 years, which has led to a decline in domestic skilled tradespeople, capacity to supply ample quantities of construction materials and professionals to oversee development. Moreover, economic factors following the COVID-19 pandemic are likely to depress employment and the housing market for some years.

**To consider huge releases of Green Belt [as Growth areas] in light of the uncertainties in the next few years is foolhardy and a disservice to our residents.**

<b>Included files</b>	<a href="#">GS SP2.pdf</a>
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15243
<b>Person ID</b>	1271086
<b>Full Name</b>	MRS PATRICIA BEL-BARKO
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper(" Changes in the Current Planning System· of August 2020) prepared in this regard in 2020. It appears that the Council' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b} of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hamel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p>

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally spilt between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses. given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council' s inner settlement plans and their assessment of housing needs.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15275
<b>Person ID</b>	1271103
<b>Full Name</b>	GRAHAM RITCHIE
<b>Organisation Details</b>	FAIRFAX STRATEGIC LAND (HEMEL) LTD
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	

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.

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").

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.

As indicated at paragraph 2.3 of the Emerging Strategy, a key challenge for the Borough is the step change in housing growth to address the objectives of the Government to significantly boost housing supply.

Although paragraph 7.5 of the Emerging Strategy refers to the application of the Government’s draft approach to establishing the Borough’s housing requirements as outlined in its proposed changes to the Standard Method, the final approach has since been confirmed by the MHCLG; the updates to the PPG issued on 16th December 2020 refer (ID ref 2a-004-202001216).

Pursuant to the above, and although paragraph 7.5 refers to a minimum annual need of 922 dwellings (equating to at least 16,596 dwellings over the plan period 1st April 2020 to 31st March 2038), resulting from the revised PPG, the scale

of growth now required is for at least 1,023 dwellings each year (through application of the approach set out in the steps of the PPG).

This results in a need to find additional allocations for at least circa 1,818 dwellings. However, and in reality, the Local Plan needs to allocate significantly in excess of this just to meet the SM requirement. Moreover, there is also the need to satisfy the duty to cooperate. Moreover, there are significant issues with certain of the draft site allocations that cannot be said to be justified when assessed against the NPPF tests of soundness. These matters are expanded upon below.

Policies SP2 and SP4 indicate that the Council's objective is to deliver a minimum of 16,596 dwellings from 2020 until 2038, equivalent to 922dpa as outlined at paragraph 7.5.

We object to the Council's suggested approach both in terms of the number of homes being planned and in relation to the plan period.

In terms of both the planned levels of growth and the Plan period to which it relates, the NPPF is clear that the minimum annual housing requirement for the Borough must be set through application of the Standard Method within the assessment of Local Housing Need.

According to the Council's Local Development Scheme (agreed July 2020), the Local Plan is due for submission in October 2021 following consultation on a proposed submission document pursuant to Regulation 19 in June 2021. Adoption of the Plan is then envisaged for November 2022.

The Planning Practice Guidance (ID ref 2a-004-20201216) is clear that any assessment of need should be derived from considering household projections over the subsequent 10 years (with the current one as the start of the period for the appraisal). Whilst the Emerging Strategy is based upon the ten year period from 2020 until 2030, unlike that detailed in paragraph 7.5 of the document, this would be based upon the household projections from the 2014 base rather than the alternative approach in the Government's consultation.

In order to ensure consistency of housing need with supply, it is essential that the assessment of the requirement also considers the adequacy of supply at the same point in time.

With submission of the Local Plan not due until October 2021, it would be feasible and appropriate to rely upon the Council's annual assessment of the deliverability and developability of sites when reviewed at the 31st March 2021. Since this is not currently available, the assessment below considers the minimum requirement when assessed in 2020 and 2021 using the current approach outlined in Guidance.

The comparison of household projections for the 10 years after both 2020 and 2021 from the 2014 base as currently required in the PPG is outlined in Table 1 below.

*Table 1: Household Projections*

Base date for appraisal

Household projections in 2014 based data

2020

2021

2030

2031

Total change

Annual average

2020

66,908

74,213

7,305

730.5

2021

67,664

74,953

7,289

728.9

The Local Housing Need must then be adjusted to take account of the latest affordability ratios as outlined in the PPG (Step 2) (ID ref 2a-004-20201216).

The most recently published affordability ratios are those from 2019 published on 19th March 2020 which indicate that the median workplace based affordability ratio for the Borough is 12.21. The affordability adjustment ratio (using the formula below) relying upon this figure results in a 51.3125% uplift on the base household projections.

This results in the minimum annual need for 2020 being 1,105 ( $730.5 \times 1.513125$ ); and 2021 being 1,103 ( $728.9 \times 1.513125$ ).

Since the Core Strategy for Dacorum Borough was adopted on 25th September 2013, the five year period that the 40% cap pursuant to step 3 of the Local Housing Need calculation only applied until 24th September 2018.

The existing Plan's annual housing requirement from 2006 to 2031 is 430dpa (Policy CS17) and as the annual averages from the household projections above are above the 430dpa in the current Plan, pursuant to Step 3 of the Standard Method a 40% cap is applied to the household projections. This results in minimum housing requirements of 1,023dpa for 20201 and 1,020dpa for 20212.

The 2020 housing affordability information for England is anticipated to be published in March 2021. Consequently, if this is available prior to the consultation on the draft Submission Plan, the Borough's housing requirement should be adjusted to ensure it addresses the minimum outputs of the Local Housing Need calculation in the PPG (ID ref 2a-004-20201216).

As detailed above, the Council's latest Local Development Scheme (July 2020) indicates that adoption of the Plan is anticipated in November 2022, 13 months after it is due to be submitted in October 2021, this is not considered realistic.

A review of the time taken for the examination of Local Plan consulted upon and submitted for examination since the original NPPF was published in March 2012 indicates that on average the period from submission though to the document's

adoption was 572 days (i.e. 1 year 7 months) (for the more than 200 Strategic documents found sound until 1st January 2021)<sup>3</sup>.

With respect of the period from consultation on draft Submission through to adoption, this took on average 749 days (just over 2 years).

For neighbouring Welwyn Hatfield, which Authority also reviewed its Green Belt boundaries as part of the Local Plan process, that Plan was submitted in May 2017 and almost four years later that Plan is still at examination.

Based on the timelines contained in the current LDS, which indicates consultation in June 2021 and submission in October 2021, a more realistic adoption date would be June 2023 (2 years from consultation) or May 2023 (13 months from submission).

Therefore, whilst it is acknowledged that the expected Plan end date of 2038 would provide the minimum 15 years post adoption obligated by paragraph 22 of the NPPF assuming adoption occurred in November 2022, as indicated above, this is not realistic. A more realistic adoption date would be summer 2023 which necessitates an extended plan period until at least 2039.

Although policies SP2 and SP4 indicate that a minimum of 16,596 dwellings are required over the 18 year period (2020-2038), this should be increased to at least 19,437 dwellings<sup>4</sup> over the 19 year period (2020-2039) as explained above. Alternatively, over the 18 years from 2021 until 2039, it would currently be a minimum of 18,360 dwellings<sup>5</sup>. These minimum requirements are therefore an increase of at least 1,764 dwellings on the targets currently outlined in the Plan.

1 730.5 x 1.4

2 728.9 x 1.4

3 Data from Local Plans: the examination process - GOV.UK ([www.gov.uk](http://www.gov.uk))

4 1,023 x 19

5 1,020 x 20

However, the PPG is also clear (ID ref 2a-007-20190220) that:

This reinforces the view that the 1,023dpa output from the Standard Method when appraised using a 2020 start date is clearly the minimum requirement and the Council should consider the scope for increasing this.

The application of the SM at the 2020 base-date results in a 18,414 requirement to be met during the plan period:

*1,023dpa x 18yrs (2020 to 2038) = 18,414 dwellings (to be expressed as a minimum).*

In addition to the minimum requirement derived from the application of the SM, there is a need to consider unmet needs within the context of the duty to cooperate. This is a central pillar of the plan-led system. Moreover, and in so far as this is a legal requirement, any failure cannot be rectified through the examination process. As such, this is a critical component of the plan making exercise that must be addressed by the Council at the outset.

In this regard paragraph 60 of the NPPF, is clear in requiring that any needs that cannot be met in neighbouring authorities should also be considered in determining the Borough's housing requirement.

Although it is recognised that the Council, along with a number of its neighbours, is preparing a South West Hertfordshire Joint Strategic Plan, as noted in paragraph

1.40 of the consultation draft Local Plan, this is designed to set the context of the period to 2050 and therefore post dates that of the emerging Growth Strategy. Accordingly, it is essential that the Council considers the extent of unmet needs from neighbouring authorities, consistent with the requirements of the NPPF.

As the principal and most sustainable settlement within the Borough, Hemel Hempstead will continue to be focus for housing growth, with Policy SP2 stating as follows:

*“Hemel Hempstead will grow by over 10,600 new homes and will deliver the majority of new employment space. A key feature of the strategy will be the intensification of sites within Hemel Hempstead through increased heights and densities.*

*Key areas for redevelopment include sites across the Town Centre and Two Waters Areas. Smaller scale development within the existing urban area will also be provided to ensure previously developed land is optimised.*

*The town will grow to the north by providing a minimum of 1,500 homes with further land to deliver an additional 4,000 homes released from the Green Belt but safeguarded to meet longer term needs<sup>6</sup>.*

*New urban extensions to the north of the settlement will be planned and developed drawing on Garden City principles, with development within and around Hemel Hempstead supporting the transformation of the town. These sites will provide or support delivery of identified strategic infrastructure requirements, and sustainable transport enhancements and improve connectivity across the town.”*

Policy SP3 sets out a settlement hierarchy, which reiterates the role to be played by the town of Hemel Hempstead in helping to meet development needs during the plan period:

*“The most sustainable location in the Borough and the focus for the majority of development and strategic and town-wide infrastructure. Hemel Hempstead acts as the primary service centre for the Borough. The town will also expand on its eastern side into St Albans City and District Council area.”*

Whilst we support the continued reliance upon the settlement of Hemel Hempstead as the principal focus for growth during the plan period, we object to the draft site allocations on the basis that they do not represent the most appropriate locations for growth when assessed against the reasonable alternatives, which include the opportunity afforded by the allocation of land west of Leighton Buzzard Road to the west of Piccotts End to the north of Hemel Hempstead.

Section 23 of the consultation draft Local Plan sets out the sites proposed to be allocated for housing and employment growth at Hemel Hempstead.

We have undertaken a critical review of the draft allocations at the larger settlements of Hemel Hempstead and Berkhamsted (where the majority of the planned growth is proposed). We have then carried out a comparative analysis of certain of the draft allocations against the credentials of the subject site.

It is clear from the landscape analysis undertaken by Hyland Edgar Driver (“HED”) and the highways/sustainability analysis undertaken by SK Transport Planning that the subject site, which is not currently proposed as a housing allocation, performs better than that draft allocations in relation to these disciplines.

In addition to the above, the findings of the Green Belt appraisal undertaken by CSA Environmental (Feb 2021), demonstrates the suitability of providing for development on the site having regard to the assessment to be undertaken pursuant to the five purposes of the Green Belt as set out at paragraph 134 of the NPPF.

Furthermore, the additional technical work undertaken to date, including in relation to archaeology, heritage and flooding/drainage, all demonstrate there are no technical constraints to developing the site for approximately 400 dwellings.

6 This includes allocations HH01 (1,500 dwellings) and HH22 (385 dwellings) located to the east of Piccotts End

The Council’s housing trajectory is set out at Figure 2 of the consultation draft Local Plan, which position should be assessed against the background of the current position where the Council is only currently able to demonstrate a 2.5 year supply of deliverable housing land, which shortfall is substantial<sup>7</sup>.

Whilst the overall sources of supply expected within the Council is provided, there is no information indicating how the level of annual completions within the trajectory is derived.

Although the Housing Topic Paper purports to be able to demonstrate a 5 year supply of deliverable housing land in 2022, this is subject to the both the realism of the Council’s expected sources together with the requirement below the minimum detailed by the NPPF.

Applying a requirement derived from the Standard Method together with the Council’s expectations of delivery (which assumptions we dispute), illustrates that there will be insufficient land delivered to maintain a rolling 5 year supply until at least April 2025 through inclusion of only a 5% buffer and the Sedgfield approach to addressing cumulative under-delivery against a 1,023dpa minimum figure.

Based upon the Council's delivery assumptions, which figures we dispute, the five year supply positions from 2020 onwards is shown in Table 1 below.

*Table 1 – The Council's 5yr Supply Positions from 2020*

**Year**  
**Supply in Figure 2**  
**5 year period starting**

**Apr 20**

**Apr**

**21**

**Apr**

**22**

**Apr**

**23**

**Apr**

**24**

**Apr**

**25**

**Apr**

**26**

**Apr**

**27**

**Apr**

**28**

2020/21

654

4,858

2021/22

1,036

5,074

2022/23

759

5,662

2023/24

1,128

5,674

2024/25

753

6,129

2025/26

1,182

6,112

2026/27

1,252

5,705

2027/28

1,347

5,323

2028/29

1,140

5,098

2029/30

1,208

2030/31  
1,165

2031/32  
845

2032/33  
965

Figure 2 below shows by applying the above supply figures (which we dispute as being too optimistic and not achievable based upon the components if supply relied upon by the Council) to the respective annualised requirement the Council would be in deficit compared to the cumulative requirement until at least 31st March 2028.

7 See paragraph 48 of the appeal decision for The Old Orchard, Shootersway, Berkhamsted (PINS Ref: 3243939) (Dec 2020)

*Table 2 – Dwelling completions envisaged in Dacorum Borough compared to minimum Local Housing Need of 1,023dpa*

<b>Year</b>
<b>Expected Completions from Figure 2</b>
<b>Housing Need at 1,023dpa</b>
<b>Cumulative Difference</b>
<b>Annual</b>
<b>Cumulative</b>
<b>Annual</b>
<b>Cumulative</b>
2020/21
654
654
1,023
1,023
-369
2021/22
1,036

1,690  
1,023  
2,046  
-356  
2022/23  
759  
2,449  
1,023  
3,069  
-620  
2023/24  
1,128  
3,577  
1,023  
4,092  
-515  
2024/25  
753  
4,330  
1,023  
5,115  
-785  
2025/26  
1,182  
5,512  
1,023  
6,138  
-626  
2026/27

1,252  
6,764  
1,023  
7,161  
-397  
2027/28  
1,347  
8,111  
1,023  
8,184  
-73  
2028/29  
1140  
9,251  
1,023  
9,207  
44  
2029/30  
1208  
10,459  
1,023  
10,230  
229  
2030/31  
1165  
11,624  
1,023  
11,253  
371

2031/32

845

12,469

1,023

12,276

193

Although Table 2 indicates the shortfall could be resolved March 2028, this same does not apply with respect of the adequacy of a 5 year supply. This is shown in table 3 below.

Table 3 indicates that by applying the Sedgefield approach to resolving previous shortfalls, the application of a 5% buffer and a 1,023dpa requirement, the Council might only be able to demonstrate a 5 year supply in the five year period April 2025 until March 2030. For all other years a deficit would arise, even on the Council's assumptions of delivery.

Table 3 - Calculating 5 year requirements and the availability an adequate supply

<b>Step</b>	<b>in</b>
<b>process</b>	
<b>5 year period</b>	
<b>2020-</b>	
<b>25</b>	
<b>2021-</b>	
<b>26</b>	
<b>2022-</b>	
<b>27</b>	
<b>2023-</b>	
<b>28</b>	
<b>2024-</b>	
<b>29</b>	
<b>2025-</b>	
<b>30</b>	

2026-

31

2027-

32

2028-

33

Minimum base requirement (5  
x 1,023)

5,115

5,115

5,115

5,115

5,115

5,115

5,115

5,115

5,115

Plus shortfall

from Table 2

369

356  
620  
515  
785  
626  
397  
73  
0  
Minimum to be addressed (exc buffer)

5,484

5,471

5,735

5,630

5,900

5,741

5,512

5,188

5,115

With 5% buffer

274

274

287

282

295

287

276

259

256

Minimum to show 5 year  
supply

5,758

5,745

6,022

5,912

6,195

6,028

5,788

5,447

5,371

Forecasted for delivery (from

Table 1)

4,858

5,074

5,662

5,674

6,129

6,112

5,705

5,323

5,098

No. of year supply

4.22

4.42

4.70

4.80

4.95

5.07

4.93

4.89

4.75

Extent of surplus/ deficit

-900

-671

-360

-238

-66

84

-83

-124

-273

To ensure sufficient land is available to robustly demonstrate a 5 year supply, it is therefore essential that further deliverable land is identified. This should include land controlled by our client's to the west of Leighton Buzzard Road, north of Hemel Hempstead (Site Ref HH69).

In our view, the land at Piccotts End, Hemel Hempstead affords a more sustainable location in helping to meet housing needs than can be said to be the case with certain of the draft allocations proposed around the town.

The allocation of the omission site at Piccotts End would contribute to a sustainable pattern of development, locating housing closer to employment opportunities and the provision of services and facilities, including education, retail and bus services; than is the case with certain of the draft allocations as currently proposed.

The following changes are necessary in order to satisfy the duty to cooperate and the tests of soundness at paragraph 35 of the NPPF:

- **Address unmet housing needs from the neighbouring authorities**, which requirement should be added to the internalised requirement for Dacorum identified through the application of the Standard

- The Local Plan should **provide for at least 1,203 dwellings per annum**, based upon the local housing need derived from the Standard Method. This results in a need to plan for **at least 18,414 dwellings during the plan period 2020 to 2038**.
- However, the Local Plan should **cover a 15 year period from its anticipated date of adoption**, and should cover the period to
- Allocate additional sites to meet the increased housing requirement, whilst allocating more appropriate sites in favour of certain of the draft allocations, that cannot be said to be justified when considered against the reasonable
- Allocate land to the west of Leighton Buzzard Road, north of Hemel Hempstead for up to 400

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15276

**Person ID** 1271103

**Full Name** GRAHAM RITCHIE

**Organisation Details** FAIRFAX STRATEGIC LAND (HEMEL) LTD

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS15282
<b>Person ID</b>	1161497
<b>Full Name</b>	Mr Robert Sellwood
<b>Organisation Details</b>	The Crown Estate
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>• <b><u>Policy SP2 'Spatial Strategy for Growth'</u></b> is supported by The Crown Estate (TCE) since the policy establishes that Hemel Hempstead is the primary focus for growth in the District. Within this, Hemel Garden Community (HGC) will provide a minimum of 1,550 homes by 2038 and an additional 4,000 homes post 2038. TCE is a significant landowner within HGC and is committed to the successful delivery of the proposals for the area in the Plan.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15305
<b>Person ID</b>	1250151
<b>Full Name</b>	Andrew Marsh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	Please note that owing to a lack of capacity we have been unable to check every site in detail and we have therefore sought to prioritise sites which we consider have the greatest potential to impact on designated heritage assets (listed buildings, scheduled monuments, Registered Parks and Gardens, Conservation Areas). It is worth emphasising that the inclusion of a site within this response does not automatically mean that it should not be allocated, neither does omission

from this list mean that there are no historic environment issues. However it is clear the issues outlined below (in particular the lack evidence and absence of specific development criteria within Policies) will apply to many of the sites proposed for allocation in the Plan. We would therefore urge the Council to review all their site specific policies to ensure that these general principles are applied to all relevant allocations. Site specific details are outlined below.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15319
<b>Person ID</b>	1271123
<b>Full Name</b>	Mr & Mrs c/o Strutt Parker Mr & Mrs A Lloyd & Mr R Dunbavand
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	<p>In respect of the current Local Plan consultation, my client's generally support the Emerging Strategy for Growth and the inclusion of the Strategic Greenfield Growth Areas. However, we do believe the plan should be more ambitious in the identification of sites in order to deliver a greater surplus and flexibility around housing delivery to meet the local need. Given the existing Green Belt nature of the Borough, we consider that further land should be released on the edge of existing sustainable settlements, such as our clients land in Berkhamsted. Furthermore, the importance of small and medium-sized sites and the contribution they can make towards maintaining housing land supply is recognised in paragraph 68 of the NPPF. It is worth noting that recently, both the St Albans City and District Local Plan and the Uttlesford Local Plan failed examination due to their over reliance on large strategic sites coupled with a lack of the small and medium sized sites necessary to maintain supply to meet the Council's housing requirements in the short to medium term. It would be disappointing if the Dacorum Local Plan was found to have similar shortcomings. Our clients combined proposals would represent one such opportunity location. The acute housing need in the Borough, including a delivery requirement of 922 homes per annum should not be underestimated and the current modest projected oversupply is not considered sufficient to provide the degree of flexibility required.</p> <p>The Housing Trajectory 2020 to 2038 at Figure 2 of the Plan (paragraph 7.13) is noted. However, attention must be given to the under supply identified for the two years 2022 – 23 and 2024 – 25. It is considered that the supply in these respective years must be boosted and to do this will require more medium sized development opportunities to be identified. Whilst</p>

it may be premature for our client's land to be able to contribute to years 2022 – 2023 given the need for the plan to be adopted before planning permission can be delivered, reasonably their land could come forward to help make up the shortfall in the years 2024 – 25. Accordingly, we would urge the Council to consider making a further allocation of our clients combined sites to help address this particular shortfall.

In respect of the Growth Strategy, our clients support the principle of the Growth Strategy for Berkhamsted which, whilst seeking to maximise urban capacity, does not pursue an urban intensification strategy which will detract from the character of the town. Instead the strategy seeks to accommodate growth through expansion of the settlement in a manner which manages landscape and Green Belt impacts. As such, they support Policy SP2 – Spatial Strategy for Growth which includes Berkhamsted as one of the primary focuses of strategic growth and investment. However, it is considered that the quantum of growth identified for Berkhamsted could be increased to be more in line with Tring, to improve the delivery of the Borough's acute housing requirements by the inclusion of additional allocations such as our client's land.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15327
<b>Person ID</b>	1271128
<b>Full Name</b>	Little Gaddesden Parish Council c/o Cllr John Saner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Spatial Strategy for Growth comment</b>	The delivery strategies for development are based on a flawed and out of date vision and as a result , we believe they will not deliver the perceived benefits.

**Included files**

<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15336
<b>Person ID</b>	1271161
<b>Full Name</b>	Philippa Seldon

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	Although I can see that more housing is needed, I am appalled that the Council could entertain the proposal to build on Green Belt. They should instead be planning to build a reasonable number of houses in a manner which conserves the Green Belt, increases biodiversity and encourages climate change and carbon reduction. With the risk of sounding thoroughly rude, I don't understand how presumably intelligent men and women can possibly be unaware of the dangerous contribution which such a plan would make to the further deterioration of our planet.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15340
<b>Person ID</b>	1271220
<b>Full Name</b>	MAUREEN RUMSEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August

2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the

existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15353

**Person ID** 1145662

**Full Name** Mrs Catherine Anderson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Spatial Strategy for Growth comment**

strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing,

Communities and Local Government advice justified by the White Paper (• Changes in the Current Planning System • of August

2020) prepared in this regard in 2020. It appears that the Council's justification is to prepare a plan in relation to this target number despite the knowledge !hat it was prepared under the use of guidance out for consultation rather than

established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

The proposed number of houses should be significantly lower than the target figure to reflect genuine demonstrable need for housing with a primary focus on affordable homes, and use of as little Green Belt land as possible.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development

rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15378

**Person ID** 1248890

**Full Name** Mr Stuart Oldroyd

**Organisation Details** Whiteacre Ltd

**Agent ID** 1270853

**Agent Name** Jon  
Goodall

**Agent Organisation** DLP Planning Limited

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

**Spatial Strategy for Growth comment**

**Policy SP2 (Spatial Strategy for Growth)**

Draft Policy SP2 (Spatial Strategy for Growth) states that the Local Plan will make provision for a minimum of '16,596 homes' during the plan period between 2020 and 2038. The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring, and then the large villages, including Bovingdon.

Whiteacre supports draft Policy SP2, which states that 240 homes will be provided in the larger village of Bovingdon to deliver growth. The Local Plan makes detailed site-specific allocations for growth in the village, which can be found in Policy SP27 (Delivering Growth in Bovingdon) and in the Proposals and Sites schedule.

The specific findings of the Council's Sustainability Appraisal in terms of supporting the overall spatial strategy for growth in relation to Bovingdon are addressed under Question 6 within this Report.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15394

**Person ID** 1271257

**Full Name** Mr Alastair Hogben

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( " Changes in the Current Planning System " of August 2020) prepared in this regard in 2020. It appears that the Council ' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p> <p>No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.</p> <p>Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.</p>

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovington, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovington, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council ' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15406

**Person ID** 1259631

**Full Name** Fay Copestake

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**Spatial Strategy for Growth comment**

I object to draft policy SP2 in its present form. To build so many houses on green belt land in Tring is detrimental to the town and its community. All green belt land should be protected across Dacorum.

It does not appear that assessments have been made regarding infrastructure for any new dwellings, or for the opportunities presented using brownfield areas.

No evidence has been put forward to justify the the vision of building on such a high scale, and certainly none for more than doubling the size of a Market Town like Tring.

**Included files**

**Title** Spatial Strategy for Growth

<b>ID</b>	EGS15432
<b>Person ID</b>	1271088
<b>Full Name</b>	MIKE WALTERS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>I strongly object to draft Policy SP2, as it is not fit for purpose In its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently. the policy requirement to deliver 2.700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.</p> <p>The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper ( "Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.</p> <p>It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.</p> <p>There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.</p>

No evidence has been provided by the Council to justify a different approach to the Intensification of sites within Tring in comparison to Hamel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hamel Hempstead.

The housing needs delivery strategy was that Hamel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the Infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial Impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council' s Inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15444

**Person ID** 350823

**Full Name** Mrs Sue Yeomans

**Organisation Details** Chairman  
Chilterns Countryside Group

**Agent ID**

**Agent Name**

**Agent Organisation**

<p>Yes / No * Yes * No</p>	<p>Yes</p>
<p><b>Spatial Strategy for Growth comment</b></p>	<p><u>HOUSING NEEDS</u></p> <ul style="list-style-type: none"> <li>The LP proposes construction of 16,596 new houses in the Borough in the 18 years between 2020 and 2038, 922 houses pa, with 5,954 of these on high quality Green Belt sites, abutting the Chilterns AONB, mainly in Berkhamsted and Tring. The CCG finds this growth is not equably distributed across the 3 main towns of Hemel Hempstead, Berkhamsted and Tring, taking current size and consequent Green Belt release into account. Development within the villages has been constrained, where there may indeed be small brownfield sites which could be developed for existing local residents, without compromising their village</li> <li>In December, 2020, Government announced revised policy on calculating national housing needs and how this would apply to Local</li> </ul> <p>The Ministry for Housing, Communities and Local Government stated: <i>‘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, <b>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.</b> It is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints.</i></p> <p>(Government response to consultation: Proposed changes to standard method for assessing local housing need 16.12.20 )</p> <p>The CCG does not accept that DBC’s LP meets this criteria or that robust factual assessment of the Borough’s future needs have been made based upon the ‘<i>standard method</i>’ required above.</p> <ul style="list-style-type: none"> <li>CCG finds that growth should be primarily focused upon Hemel Hempstead, as the main town of the Borough, which has greater existing and potential capacity to support such growth and requisite infrastructure, coupled with better connectivity.</li> </ul>

- There is greater potential within Hemel Hempstead's town centre and within its communities than in Tring and Berkhamsted for redevelopment for housing of unused retail and commercial. Such sites could be valuable in providing low-cost and social housing and would meet Government requirements to utilise brownfield sites before consideration of Green Belt.
- CCG finds that DBC has failed to make proper robust assessment of brownfield sites within the boundaries for the existing settlements of Tring and Berkhamsted, which it is required to do by Government, before proposing release and development of Green Belt outside present urban
- CCG finds the proposed growth for the smaller market towns of Tring and Berkhamsted to be wholly disproportionate, unjustified and lacking in valuing their surrounding environment and

We do not accept the vision for the market town of Tring as being sustainable when vast swathes of Green Belt, some top quality agricultural land, would be irretrievably lost to development of large housing estates outside the settlement's present boundaries nor the view that Tring should bear a more substantial loss of Green Belt than other areas within the Borough.

- Recognising that growth and change can be beneficial if approached in the most appropriate way for the individual location, the CCG finds the LP fails to deliver both this and the DBC's vision statement ( p5 of the Summary). We find the LP contradictory in its identification and selection of large Green Belt sites for development and its vision for existing and future communities and the environment within the
  - CCG finds that growth should be primarily focused upon Hemel Hempstead, as the main town of the Borough, which has greater existing and potential capacity to support such growth and requisite infrastructure, coupled with better connectivity.
- We would suggest there are more opportunities there, which have not as yet been considered, for redevelopment of unused retail and commercial (brownfield) sites for housing, which would be valuable in providing low-cost and social dwellings and would meet Government requirements to utilise brownfield sites before consideration of Green
- CCG finds that DBC has failed to make proper robust assessment of brownfield sites within the boundaries for the existing settlements of Tring and Berkhamsted, which it is required to do by Government, before proposing release and development of Green Belt outside present urban

- CCG finds the proposed growth for the smaller market towns of Tring and Berkhamsted to be wholly disproportionate, unjustified and lacking in valuing their surrounding environment and

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15470

**Person ID** 1271103

**Full Name** GRAHAM RITCHIE

**Organisation Details** FAIRFAX STRATEGIC LAND (HEMEL) LTD

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** SEE ATTACHED RESP

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15479

**Person ID** 1271381

**Full Name** Alison Walker

**Organisation Details** Associate Director of Strategic/Large Projects  
Thakeham Homes

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

## Spatial Strategy for Growth comment

- 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 Additional allocations will therefore

be required in order to deliver the 1,818 additional dwellings now required over the Plan period.

- In updating the Spatial Strategy, and indeed the Plan as a whole, in order to meet these new housing requirements, it will be important to consider this holistically alongside the other forms of provision required to ensure that the Council's vision is met with the necessary supporting infrastructure delivered alongside the required homes and
- We support the proposed Spatial Strategy which sets that the focus of strategic growth and investment will be at the most sustainable locations. Hemel Hempstead will be a focus of growth, supported by growth at Berkhamsted and Tring. It will be important that the growth to be allocated to the large villages of Bovingdon, Kings Langley and Markyate is proportionate to the sustainability and size of these settlements respecting the Spatial Strategy's approach to
- It is noted that the Settlement Hierarchy Study (October 2017) which supports the Local Plan, identified Hemel Hempstead, Berkhamsted and Tring as all scoring High in the accessibility audit outcome, containing each category of higher order services assessed and having all types of key services. It is clear therefore why these three settlements are the focus of the majority of the required
- The Local Plan as currently drafted proposes 10,600 new homes at Hemel Hempstead, 2,200 at Berkhamsted and 2,700 at Tring. Whilst it is recognised that, although scoring comparably in the Settlement Hierarchy Study, Hemel

Hempstead is a more sustainable location for growth of these three settlements, it is unclear why the disparity in the level of growth afforded to Berkhamsted and Tring is considered. It is recommended that this is reviewed and addressed through the additional growth now required to be met as a result of the new Standard Methodology with additional growth apportioned to Berkhamsted.

- We support the Council's aspiration that in addition to the delivery of housing, development at Berkhamsted will:

*“enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.”*

- It is considered our client's site, Bulbourne Cross, would make an important contribution to the achievement of these
- Whilst it is considered that when read as a whole the Local Plan and its supporting evidence base make a clear and compelling case for the exceptional circumstances which justify the release of Green Belt in the Borough, it is considered that this could be more clearly expressed within the Local Plan itself. The inclusion of a specific section addressing this point in Section 5 of the Local Plan would aid the clarity of the Local
- Policy SP2 also sets out that the Council is proposing to release additional land to the north of Hemel Hempstead from the Green Belt to meet longer term needs. Such an approach is in accordance with the NPPF and is supported in
- Whilst as identified above the housing requirement for the Borough in the Plan period has increased as a result of the Standard Methodology changes, it is considered that additional allocations should be made to meet this need with the additional 4,000 homes possible to the north of Hemel Hempstead continuing to be safeguarded to meet future needs. Indeed, given the timescales for delivery of such a large site (in addition to the 1,500 dwellings to be delivered to the north of Hemel Hempstead during the current Plan period) it is questionable to what extent these homes could be delivered in the Plan period in any event

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15514
<b>Person ID</b>	1162394

<b>Full Name</b>	Grahame Senior
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	The sustainable development strategy should respect the precious assets of greenbelt land adjacent to our area of outstanding natural beauty. There are plenty of less sensitive sites to develop in the (word unclear)-industrial wasteland.
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15545
<b>Person ID</b>	1271479
<b>Full Name</b>	MS JANE HARRISON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>• This Section of these representations addresses individual policies within the emerging Plan and comments on their soundness. Please note that this should be read in conjunction with preceding sections of this report which considered the Duty to Cooperate, Housing Needs and Need for Specialist</li> <li>• As set out in the preceding sections, Retirement Villages considered the emerging Local Plan is currently 'unsound' on the basis of the following:</li> </ul>

- 1 The Housing Needs figure does not accord with the latest government Local Housing Need figure of 1,023dpa (as per revisions to the Standard Method in December 2020).
- 2 The Plan does not seek to meet its needs in full for older persons At policy DM9, the Plan mistakenly includes the need figures 2020-2036 which is 2 years short of the Plan Period to 2038.
- 3 Whilst the Plan includes meeting the housing needs of older people as a strategic objectives, there are a lack of meaningful policies to ensure this that this translates in to Housing for older people is directed towards 5 “growth area” site allocations which appears an afterthought with no details in terms of quantum or tenure provided. In addition, these will deliver over the longer term and will not address the existing unmet needs which exist within the Borough.

- In order to resolve the soundness issue, Retirement Villages strongly recommends that the DBC Local Plan should:
  - Adjust its annual housing delivery targets within Policy SP2 to state that the Plan will make provision for ‘a minimum of 18,414 homes’ across the Plan
  - Update the needs figure for older persons accommodation at policy DM 9 to ensure that this covers the whole Plan
  - Allocate new sites that have the ability to deliver older persons accommodation in the short term based on existing infrastructure which and can managed by experienced companies such as Retirement Villages (including the Site).
- This Section does not comment on other site-specific allocations. Instead, it focuses on policies of relevance within the emerging Local Plan and sets out Retirement Village’s

comments and recommendations on these policies in terms of the tests of soundness in the NPPF.

- Please note that the following does not seek to comprehensively comment on all policies contained within the Regulation 18 stage We reserve the right to comment on other policies within future consultation drafts of the plan.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15547
<b>Person ID</b>	1271479
<b>Full Name</b>	MS JANE HARRISON
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p><u>Policy SP2: Spatial Strategy for Growth</u></p> <ul style="list-style-type: none"> <li>Policy SP2 states that a minimum of 16,596 homes will be provided across the Plan As stated above, this does not address latest government Local Housing Need figure of 1,023dpa (as per revisions to the Standard Method in December 2020) which equates to 18,414 homes across the Plan Period. Paragraph 11 of the NPPF requires that, as a minimum, plans should provide for housing need. On this basis, policy SP2 is “<b>inconsistent</b>” with the NPPF and <b>unsound</b>. Notwithstanding this, the Council’s strategy of concentrating growth in sustainable locations including Berkhamsted is supported.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15556
<b>Person ID</b>	1264530
<b>Full Name</b>	BRENDA AND ROY HURLEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	I strongly object to draft Policy SP2, as it is not fit for purpose in its current form. Neither the housing need figure of 16,596 homes or the basis of its calculation can be relied upon to be robust. Subsequently, the policy requirement to deliver 2,700 homes within Tring at SP2.3c), wherein the majority is located within the Green Belt, cannot be justified in planning terms. The Council has failed to justify this target as a requirement against market evidence, planning designations

and policy, Government advice and by way of cooperation with surrounding Local Planning Authorities within Hertfordshire, Bedfordshire and Buckinghamshire.

The target is broken down to 922 homes per annum, which the Council consider has been derived from the Ministry of Housing, Communities and Local Government advice justified by the White Paper(" Changes in the Current Planning System" of August 2020) prepared in this regard in 2020. It appears that the Council' s justification is to prepare a plan in relation to this target number despite the knowledge that it was prepared under the use of guidance out for consultation rather than established; with a notional intention to decrease or increase the housing supply number on the outcome of further consultation. The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.

It is only after consideration of the level of 'need' alongside the constraints of the Green Belt can the actual land available for development be determined and a decision be made on how many homes should be planned for the area concerned.

There is a requirement for the Council to reassess their initial standard method housing target, but there is then a substantial amount of work to be undertaken to determine the actual practical opportunity for the delivery of housing and infrastructure within the borough in a manner that does not undermine the strong protection for the Green Belt as set out in Paragraph 11b) of the Framework, given that without such analysis the Council cannot bring forward exceptional circumstances so as to allocate Green Belt for such housing.

No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead. No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.

Irrespective of the eventual housing supply requirement for Tring, there is a requirement to establish the opportunities within the existing settlement boundaries before land outside of it is considered. The same approach to assessment is required within Tring as was undertaken in Hemel Hempstead.

The housing needs delivery strategy was that Hemel Hempstead provides the vast majority of housing supply and the remaining requirement is equally split between Tring, Berkhamstead, Bovingdon, Kings Langley and Markyate - this was appropriate so as to reduce impact on infrastructure. At Paragraph 5.6, the Council have identified that this approach was discounted due to the constraints on the infrastructure of Bovingdon, Kings Langley and Markyate. However, I note that there has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.

Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units. The implications of these factors have to be considered within the council' s inner settlement plans and their assessment of housing needs.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15566

**Person ID** 1271578

**Full Name** R Smith and A Lyell

**Organisation Details**

**Agent ID** 1269623

**Agent Name** Mark  
Harris

**Agent Organisation** Associate  
Bidwells LLP

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth 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 its centre.

As is discussed further below, the proposal put forward through 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 alleviate 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.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15571

**Person ID** 1271579

**Full Name**

**Organisation Details** BOYER PLANNING ON BEHALF OF W LAMB LTD

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment**

- This section sets out W Lamb Ltd’s position regarding the level of housing need and housing requirement identified in the Draft New Local Plan.
  
- We object to Policy SP2 on the basis that it does not make provision for the full 18,414 dwellings over the 18 year period (1,023 dpa) based on the standard method as set out in the NPPF and PPG. No justification has been given in the draft Plan for adopting a lower figure. In the interests of the soundness of the Plan, it is recommended that the housing numbers are amended.
- In the interests of the soundness of the Plan, it is recommended that the Policy should also be amended at 3 a) to include for 500 dwellings on Land at Shendish, Apsley.
- The Policy wording at 4 should be amended, on the basis that the current Plan does not make adequate housing provision and cannot therefore resist other Development.
  
- The Draft Plan sets out at Policy SP4 – Delivering the Housing Strategy that the Plan will deliver a minimum of 16,596 net additional homes across the Borough over the plan period 2020-2038. The Policy goes on to confirm

that housing growth will be concentrated at the existing urban areas of Hemel Hempstead, Berkhamsted and Tring as well as three of the larger villages of Bovingdon, Kings Langley and

- DBC acknowledge in the introduction to the Housing Topic White Paper that:

*“The Borough of Dacorum is facing challenging pressures for new development over the next 15 years which it must tackle through the Dacorum Local Plan (2020- 2038) Emerging Strategy for Growth. In particular, the need for homes, employment land and associated infrastructure is much higher than faced by previous Plans yet this has to be planned for in the context of the same extensive planning and environmental constraints.”*

- DBC recognises the importance of housing delivery stating at Paragraph 7.3 of The Development Strategy Background Topic Paper:

*“The Council has concluded that it should face up to these challenges and that accommodating lower growth levels would not be the best option for the Borough. While the Council recognises the difficulties of meeting its development needs and securing the necessary infrastructure, it considers the benefits of this scale of growth, on balance, outweigh these problems.”*

- However, the Council based their housing target of 922dpa (a total of 16,596) on the Government’s ‘Planning For the Future White Paper’ August 2020 and the ‘Changes to the Current System’ consultation paper, which indicated that a new element could be added to the Standard Method (as set out in paragraph 6.26 of the Housing Topic Paper) resulting in a different housing figure for the Borough than that identified under the current standard method
- As the new approach had not been formally introduced, to rely on it as the basis for Plan making was not a sound approach, as the formula had not been finalised or included in national policy, unlike the currently adopted Standard
- The Council acknowledges that this formula had not been formally adopted at paragraph 6.29 of the Housing Topic Paper and provides no real justification, as to why it chose to take this approach.
  
- The Governments’ announcement on the 16th December 2020 confirmed that the current Standard Method to assess housing need would not be revised, as proposed in the White Paper, maintaining the method that has been in place since 2018, with some tweaks. The current standard method will now need to be reflected in the emerging Local
- This unsound choice of housing need calculation has resulted in a shortfall of 1,818 dwellings over the plan period and thus it was not appropriate to base a Local Plan on a speculative The Council should have relied on the adopted version instead.
- The Council therefore need to revise their methodology and ensure that the Plan accommodates the growth levels calculated under the current standard method in the new This will also require DBC to undertake a further Regulation 18 consultation in our view.

- Chapter 5 of the NPPF sets the framework for housing delivery, including the Government’s objective to significantly boost the supply of homes (paragraph 59). The Government is committed to ensuring that: *“a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”*.
- The Government also state at Paragraph 60 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 – 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.”*

- The PPG sets out the 3 steps to be followed in calculating the minimum annual local housing need figure calculated using the standard method (Paragraph: 003 Reference ID: 2a-004- 20201216). The fourth step is not applicable as Hemel Hempstead is not in the top 20 cities and urban centres list and the 35% uplift does not therefore
- The NPPF (paragraphs 67 - 69) goes on to emphasise the importance of understanding and delivering a sufficient supply and mix of housing, particularly in respect of:
  - 1 specific, deliverable sites for years one to five of the plan period; and

1 specific, developable sites or broad locations for growth, for years 6-10 and ,where possible, for years 11-15 of the

- In order to maintain supply and deliver, the NPPF expects (paragraphs 73 – 75):
- strategic policies should include a housing trajectory and the anticipated rate of development for specific sites.

#### Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

- an annual update of 5-year supply of specific deliverable sites (including an appropriate buffer moved forward from later in the plan period); and
- local planning authorities should monitor progress in building out sites which have
- As indicated above, DBC has based the emerging housing numbers on the “Planning for the Future White Paper” consultation, which is clearly in contradiction to the advice set out in the NPPF and PPG. However, the South West

Hertfordshire Local Housing Needs Assessment 2020 (LHNA), which assesses future development needs for housing across South West Hertfordshire for the period 2020-2036 has been based on the current standard method

- The LHNA sets out how the three step process in paragraph 004 of the PPG on Housing and Economic Needs Assessment is applied to South West Hertfordshire and its constituent districts stating:

*“In all the local authorities within the SW Herts HMA, the Local Plan is older than 5 years and the increase 2 is greater than 40%. The cap is therefore applied at 40% above the higher of the projected household growth (step 1) or the average annual housing requirement set out in each of the adopted locals plans.....*

*As set out Table 4 in every authority the projected household growth set out in step 1 is also higher than the adopted local plan housing requirement. The 40% cap is therefore applied to the figure in Step 1.”*

- Paragraph 3.8 of the Housing Topic Paper refers to Table 3.1 which summarises the calculations using the standard method for South West Hertfordshire and Dacorum as follows:

Standard Method Calculation

Dwellings per annum

South West Herts

Dacorum

Step 1. Setting the baseline

2,888

731

Step 2. An adjustment to take account of affordability

– this increases the figures to:

4,674

1,108

Step 3. Capping the level of any increase

4,043

1,023

- As the Draft Local Plan was issued for consultation, prior to the Governments' announcement on the 16th December 2020 abandoning the proposed White Paper consultation changes to the Standard Method of Housing Need, the current method that has been in place since 2018 has not been followed. As a result the draft plan sets a housing target of 922dpa (a total of 16,596).
  - The Council's evidence base at paragraph 6.14 of the Housing Policy Background Topic Paper sets out that under the Standard Method the minimum requirement for Decorum is 1,023dpa, which would come to a total of 18,414 dwellings over the 18 year period of the Local Plan, starting from a base year of 2020. The Draft Local Plan therefore underprovides by 101 dpa resulting in a total under provision of 1,818 over the plan
  - This shortfall is particularly concerning as the Council have a track record of under delivery, as shown by the latest Housing Delivery Test results which show that over the previous 3 years, they only delivered 89% of their target, with a declining rate of new homes being completed each year (2017/18: 587, 2018/19: 576 and 2019/2020: 522). This is explored further in Section 5 of this report Housing Supply.
  - Therefore, to arrest this decline, DBC need to take an ambitious and proactive approach to housing needs in their area, and thus should be using the 1,023dpa target set by the Government's Standard Method. This should help provide a greater number of sites in the Local Plan, and thus enable a wider choice of land and dwelling types to be delivered at any given time in the Borough, which is of itself would help towards the Government's wider target of 300,000 homes each year in the country by the middle of the
- 
- Consideration should also be given as to whether a higher level than the Standard Method approach should be planned for. The LHNA recognizes the requirement under Paragraph 010 in the PPG, as to whether it would be appropriate for the SW Hertfordshire authorities to plan for a higher housing need figure than the standard method
  - The LNHA is clear that that some neighbouring authorities including those in London and within the Housing Market Area are likely to have unmet need and that it is for each local authority to consider the extent of the identified unmet need it could
  - The LNHA also considers whether as per the PPG, local authorities should also consider an increase in housing requirements where it could help deliver the required number of affordable homes, but concludes it was not

- As indicated above, the LNHA anticipates that some of the neighbouring authorities are likely to have an unmet need. The Housing Topic Paper indicates at Paragraphs 7.2-7.4 that while DBC has written to the neighbouring authorities and the Council has ‘actively engaged with these authorities’, the matter has yet to be
- It is therefore unclear whether the housing target for DBC needs to take account of unmet need from elsewhere, and in particular the London authorities and other heavily constrained authorities within Hertfordshire, that will need to be reflected in its overall housing

### *Affordable Housing*

- The LHNA addresses affordable housing, other housing needs and housing mix in Part B of the document. The LHNA identifies an estimated net housing need in south west Hertfordshire 2020-2036 for affordable rent/social rent and affordable home ownership of 3,188 affordable homes per annum. Dacorum’s estimated need is 611 homes per annum or 10,998 affordable over the Plan period up to
- It is considered that this level of demand is significant being higher than the overall annual housing target in the adopted Local Plan and 60% of the LHN for Dacorum, based on the current standard
- The LHNA goes on to state “*given the scale of affordable housing need the authorities should seek to deliver as much affordable housing as viability allows.*”
- While, as indicated above, the LHNA indicated that an increase in the housing target is not required to help the delivery of affordable homes, there is no further detailed assessment undertaken by DBC as to whether this would be appropriate, particularly given the significant level of affordable housing need identified in the LHNA.
- At Policy DM2 Affordable Housing it is explained that the Council will seek 40% affordable housing provision, from all Growth Areas and all new dwellings elsewhere and 35% from the existing urban area. The Policy acknowledges, in line with the LHNA, that the overall viability of the scheme will be taken in judgements about the level, mix and tenure of affordable housing. It is clear that the policy provision will generally be expected, representing a high tariff, particularly when combined with Community Infrastructure Levy payments and other contributions which may impede viability and therefore affordable housing
- As such, it is recommended that the Council consider whether increasing the proposed housing requirement would allow for a more achievable affordable housing target to be set, that more fully reflects the identified affordable housing

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

- In summary, the Draft Local Plan housing target has been underestimated by 1,818 over the plan period when compared to the standard method, which should be relied upon in line with the NPPF, PPG and South West Hertfordshire Local Housing Need
- Further, it is unclear whether or not a higher level housing target should be deployed to assist with unmet demand from elsewhere and the shortfall in affordable housing provision within
- In any event, the PPG is clear that the standard method represents a 'minimum' target number and this requirement should be fully reflected in the Plan.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15583

**Person ID** 1271610

**Full Name** MR SIMON MILLIKEN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Spatial Strategy for Growth comment** EH Smith SUPPORT the 'Spatial Strategy for Growth' in terms of the Council's assessed need to provide a net floorspace increase of 116,500 sq m of industrial floorspace on previously developed land in the Borough in the period between 2020 and 2038.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15584

**Person ID** 1271610

**Full Name** MR SIMON MILLIKEN

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	In conformity with Policy SP5 - 'Delivering the Employment Strategy'; Policy DM16 - 'General Employment Areas'; and Policy SP11- 'Development in the Green Belt' , Policy SP2 (Criteria f) relating to development in the 'rural areas' should be AMENDED  to include the ' <i>expansion of the General Employment Areas at Upper Bourne End Lane / Stoney Lane (Bourne End Mills) and the former Bovingdon Brickworks (Growth Areas Cy01 and Cy02)</i> '
<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15632
<b>Person ID</b>	1271974
<b>Full Name</b>	EMILY FORD
<b>Organisation Details</b>	SENIOR PLANNER
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<ul style="list-style-type: none"> <li>The principles behind the proposed spatial strategy set out in paragraph 2 are supported as it is considered DBC should deliver the Borough's housing requirement to significantly boost housing supply as well as delivering economic aspirations, by providing employment opportunities, and supporting retail development.</li> <li>Building on this, Policy SP2 is broadly supported, albeit some amendments are recommended for</li> </ul> <p><u>Quantum of Development</u></p>

- We note that Policy SP2 identifies that the Plan will make provision for a minimum of 16,596 homes between 2020 and 2038, equating to We support DBC in making provision for, as a minimum, the full local housing need of the Borough which we consider is essential for significantly boosting housing supply in line with the principle established at paragraph 5.2 of the Plan and in accordance with the Government's objective of significantly boosting the supply of homes set out in paragraph 59 of the NPPF.
- However, 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 local housing need 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.
- In this regard, Policy SP2 should be amended to state that the Plan will make provision for 'a minimum of 18,414 ~~16,596~~ homes'.
- In addition, the Council must recognise that this is the minimum number of homes that they must plan Paragraph 60 of the NPPF requires the Council to take account of any unmet needs in neighbouring areas. It is therefore vital that the draft Plan reflects the outcome of discussions with neighbouring authorities, including as part of the preparation of the JSP, to address unmet needs that may be identified across the sub- region. Whilst the timeframe for the ongoing preparation of the Joint Plan may be uncertain, we recommend that the Local Plan has regard to its emerging evidence base and seeks to take account of discussions about the apportionment of growth to ensure that it is consistent and sound.
- Finally, we would also suggest the Council need to be cognisant of unmet needs arising in other areas, most pertinently for the wider South East, in respect of London's inability to meet its own housing needs given the strong geographical and migratory links between the capital and the

#### Distribution of Growth and Exceptional Circumstances for Release of Land from the Green Belt

- As set out in paragraph 4.24 of the Development Strategy Topic Paper (November 2020), Dacorum is highly constrained by Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB). Existing urban capacity is not sufficient to satisfy the identified housing

- The capacity of the existing urban area identified in the Urban Capacity Study (November 2020) is 10,900. If this ambitious total were to be achieved it would equate to just under 60% of the total proposed housing across the plan period (taking account of the increase on the latest December 2020 local housing need figure), leaving approximately 40% of identified housing need to be delivered outside of existing urban
- Moreover, options considered for accommodating growth outside the Green Belt, such as locating growth in the countryside beyond the Green Belt, at existing small villages or a new town, or within the AONB, are evidently not as deliverable or sustainable as the proposed spatial strategy as DBC set out in Chapter 5 of the Development Strategy Topic Paper and within the
- Paragraphs 39-5.42 of the Development Strategy Topic Paper and the Green Belt Topic Paper (November 2020) make clear that all the authorities within the South West Hertfordshire area are facing similar challenges in regard to allocating land to meet their locally assessed housing needs and, as such, housing need arising in Dacorum cannot feasibly be accommodated elsewhere.
- We therefore consider that all other reasonable options for accommodating growth have been examined fully in accordance with paragraph 137 of the NPPF and the proposal to amend the Green Belt boundary around Berkhamsted is justified by exceptional circumstances, as required by paragraph 136 of the NPPF. Specifically, the scale of housing need (market and affordable) which cannot be feasibly or sustainably met on land outside of the Green Belt and the limited contribution the land within the West Berkhamsted Growth Area to the Purposes of the Green Belt.
- To this end, DBC's comment at paragraph 28 of the Topic Paper that 'if housing need is to be fully met, then there is no alternative other than to remove some land from the Green Belt' is supported.
- Turning to locations for growth, paragraph 138 of the NPPF emphasises the need for strategic policy making authorities to promote sustainable patterns of development when reviewing Green Belt. Where it is concluded that it is necessary to release Green Belt land for development, plans are required to first consider land which has been previously developed and/or is well served by public transport. Plans are also required to set out ways removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt Land.
- Against this background, we support the identification of Berkhamsted, one of the three main sustainable settlements in the Borough, as a location for growth. We welcome the principle set out in paragraph 5.2 of ensuring the important key market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement

Hemel Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations.

- We also support the proposed growth strategy for Berkhamsted set out in paragraph 5.5. In particular, we support the recognition that an urban intensification strategy risks detracting from the character of the Berkhamsted and should therefore not be. In this context, the accommodation of growth through urban expansions to the settlement which, as set out in paragraph 5.5, manage landscape and Green Belt impacts whilst also

meeting DBC's aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities is supported.

- To support, evaluate and inform the prospects for Green Belt release, DBC have undertaken a series of Green Belt Reviews, which, divided into three stages, aim to provide a robust assessment of the various function of Green Belt within the Stage 1 of the Green Belt Review comprises a strategic review of Green Belt undertaken by Sinclair Knight Merz (2013) that considers the contribution and role of the land parcels as part of the Green Belt.
- Stage 2 of the Green Belt Review (undertaken by Arup, 2016) is more refined and further breaks down the parcels identified within Stage 1, to consider the potential consequences of development within each parcel with further assessment undertaken to refine sub- areas to consider the sensitivity for each land parcel to residential
- Finally, Stage 3 of the Green Belt Review (undertaken by Arup, 2020) and forming part of the evidence base for the draft Local Plan assesses the potential housing and employment site allocations that lie within the Green Belt, considering the acceptability of the sites in Green Belt boundary. The Stage 3 Green Belt Review identifies that the Site is located within Site No 16 – Land between Shooters Way and A41 bypass. The Stage 3 Green Belt Review identifies that Site 16 is considered to have a Neighbourhood Value, a Low-Moderate Susceptibility, and a Moderate-Low Sensitivity.
- In providing an overview of the findings of the extensive stages of Green Belt review, DBC have prepared a Green Belt Summarising Document (November 2020). This broadly concludes that land parcels to the west of Berkhamsted make a partial or moderate contribution to the purposes of the Green Belt comparative to the east of the town which is identified as making a strong contribution, particularly in relation to preventing the merging of neighbouring
- In reviewing the findings of the stages of Green Belt Review, a Landscape Visual Appraisal and Green Belt review has been undertaken by Barton Willmore (**Appendix 3**). This includes an independent assessment of the Site

against Purposes 1-4 of the Green Belt as set out in Paragraph 134 of the The conclusions of this assessment are summarised in the table below:

- **Purpose**

- Criteria**

- Contribution**

- 1. Check the unrestricted sprawl of large built-up areas

- Development on the Site, Proposed Growth Area Bk08: Rossway Farm, would be well contained by Shootersway to the north and the A41 to the south, along with the associated substantial boundary vegetation; and set on the settlement edge of Berkhamsted, with the existing residential properties off Shootersway to the immediate north of the Site.

- The Site is also located adjacent to between Proposed Growth Area Bk05: Blegberry Gardens to the east of the Site, and Proposed Growth Area Bk 06: East of Darr's Lane to north of the Site, to the immediate north of Shootersway. The Site would therefore not contribute to a disorganised, incoherent, sporadic, dispersed or irregular extension to the settlement of Berkhamsted; and would be contained within robust and defensible boundaries; either in considering the Site specifically, or in combination with the adjacent Proposed Growth Areas BK05 and BK06. The Site would be set within a coherent settlement pattern, both independently, or as part of the extension of Berkhamsted in conjunction with Proposed Growth Areas BK05 and BK06.

- The Site would therefore not contribute to, or be perceived as, sprawl.

- None

- Prevent neighbouring

- towns from merging into one another

- Development on the Site would not result in neighbouring towns merging. The existing settlement of Berkhamsted extends to the north-west, north, east and south-east of the Site, such that development on the Site would not physically or perceptually reduce the separation between neighbouring towns. Furthermore, there is a substantial swathe of the Chilterns AONB and remaining Green Belt to the south-west, west and north west that would continue contribution to maintaining the separation of surrounding settlements.

- None

- Assist in

- safeguarding the countryside from encroachment

- The Site is predominantly undeveloped. However, the Site is located on the edge of Berkhamsted, with recently constructed residential development to the immediate north of Shootersway, and with the south eastern extent of the Site adjoining the settlement the settlement, and connected to the settlement by PROW

033. The Site is subject to urbanising influences from the proximity of the settlement of Berkhamsted and, in particular, intrusive audible traffic noise from the A41.

Limited

- Contrary to some of the conclusions of the Green Belt Summarising Document, the Green Belt Review undertaken by Barton Willmore concludes the Site has limited to no contribution to the purposes of the Green Belt for the reasons set out in the table
- With Land at Rossway Farm, contained by robust existing physical features such as the A41 and Shootersway, defensible boundaries to the Green Belt can be formed, in the event the Site is released from Green Belt for Likewise, when considered comprehensively with neighbouring Proposed Growth Areas Bk05 and Bk06, the A41 and Darr's Lane would further form robust defensible and permanent boundaries to the Green Belt, should the West Berkhamsted Growth Area be released from the Green Belt, as is proposed.
- Therefore, in supporting the distribution of growth, we consider that exceptional circumstances are justified to support the release of the Site and the wider West Berkhamsted Growth Area through the requirement to meet identified housing needs in full to boost the supply of housing following assessment of all alternative spatial We furthermore have demonstrated through an independent Green Belt Review that development of the Site would not prejudice the purposes, or the character, of the remaining Green Belt; and would not compromise the ability of the wider remaining Green Belt to meet its purposes. The removal of the Site from the Green Belt at West Berkhamsted is therefore fully supported.

#### Infrastructure Delivery

- We recognise that development at Berkhamsted offers opportunities for new and improved infrastructure, as referred to in part 3b of Policy However, we recommend that the wording is amended as follows to be consistent with national policy:

Development ... will provide ~~significant~~ new investment into sustainable transport initiatives, education, open space and sports facilities, to ensure the impact of development is appropriately mitigated.

- Section 33A of the Planning and Compulsory Purchase Act 2004 requires that local planning authorities engage constructively, actively and on an ongoing basis in any process by means of which activities associated with the preparation of development plan documents are undertaken so far as relating to strategic
- National Planning Policy is clear that 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 In particular, it is emphasised that joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere (NPPF paragraph 26).
- 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 focussed 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).
- Croudace welcome the ongoing engagement with neighbouring Croudace also welcome the intention to prepare Statements of Common Ground / Memoranda of Understanding, as noted in paragraph 5.46 of the Topic Paper, which will serve as important evidence to robustly demonstrate that the Duty to Co-operate has been fulfilled in the plan making process. In the context of NPPF paragraph 27 which requires that statements be made publicly available throughout the plan-making process to provide transparency, we recommend that statements are prepared and published at the earliest opportunity and updated where necessary to reflect the outcomes of ongoing discussion.
- 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.
- We agree that nearby authorities are facing substantial growth challenges, with significant identified demand for development and limited availability of suitable land necessitating consideration of Green Belt release. In this context, it is evident that the scale of growth required in Dacorum Borough cannot feasibly be addressed by neighbouring However, clear evidence of discussions regarding the ability of neighbouring authorities to accommodate housing need arising in Dacorum, and responses from these authorities confirming their inability to provide assistance, should be presented as part of the Local Plan. As we detail further below, this evidence will form an important part of the justification of exceptional circumstances to support the proposed release of land from the Green Belt.

- In this context, and as the Plan progresses, it will also be important to take account and be cognisant of any requests from neighbouring authorities to assist in meeting their housing and infrastructure needs to ensure that growth across the wider South West Hertfordshire area can be met in
- In addition to current discussions with nearby authorities, it is noted that work is at an early stage in the preparation of a South West Herts Joint Strategic Plan (JSP), which will include This strategic plan is intended to consider how the challenges of growth in South West Herts can be addressed in the longer term to 2050 and is expected to come into force by the end of 2023.
- It is recognised the JSP is at an early stage of its preparation and therefore should not prevent the Local Plan being prepared in a timely manner to ensure that development needs in the Borough can be met and However, recognising the potential for overlap in the preparation of the Local Plan and JSP it is noted that a consistent approach will be needed in the preparation of the JSP to ensure that the spatial strategy and delivery of growth is aligned with the DBC Local Plan once adopted.

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15666

**Person ID** 1272282

**Full Name** Plato Estates

**Organisation Details** c/o DLP Planning

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

- We object to Policy SP2 ('Spatial Strategy for Growth') on the grounds that it fails to promote development on brownfield land, particularly by allowing the redevelopment of sustainable previously developed sites in rural areas. This is not currently in accordance with paragraph 117 of the NPPF which states that "*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*".

- We suggest therefore that a new point 6 is added to Policy SP2 that states:  
*“6. The Council will support development on brownfield or previously-developed sites, including suitable brownfield sites in rural areas that are physically well- related to existing settlements”*
- In addition, this policy should also recognise and plan specifically for older persons’ needs within the overall spatial strategy for growth. We suggest that paragraph 1a of Policy SP2 is amended to state:  
*“a. A minimum of 16,596 homes, including provision of older persons’ housing and other specialist forms of accommodation”*

**Included files**

**Title** Spatial Strategy for Growth

**ID** EGS15708

**Person ID** 1273151

**Full Name** Ms Megan Green

**Organisation Details** Senior Planner  
Thakeham Homes Ltd

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Spatial Strategy for Growth comment**

Policy SP2 sets out the Council’s proposed Spatial Strategy and how this is to be delivered. 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. Thakeham believes the Council must address the shortfall of 101 dwellings per year. 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 18-year Plan period.

In updating the Spatial Strategy, and indeed the Plan as a whole, in order to meet these new housing requirements, it will be important to consider this holistically alongside the other forms of provision required to ensure that the Council's vision is met with the necessary supporting infrastructure delivered alongside the required homes and jobs.

We support the proposed Spatial Strategy which predicates that the focus of strategic growth and investment will be at the most sustainable locations. Hemel Hempstead will be a focus of growth, supported by growth at Berkhamsted and Tring. It will be equally important that the growth be allocated to the large villages of Bovingdon, Kings Langley and Markyate. Further, that any such growth be proportionate to the sustainability and size of these settlements with respect to the Spatial Strategy.

Whilst it is agreed that, when read as a whole, the Local Plan and its supporting evidence base make a clear and compelling case for the exceptional circumstances which justify the release of Green Belt in the Borough, it is considered that this could be more clearly expressed within the Local Plan itself. The inclusion of a specific section addressing this point in Section 5 of the Local Plan would aid the clarity of the Local Plan.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15750
<b>Person ID</b>	1271978
<b>Full Name</b>	JOANNA HARLEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>This document has been prepared by a working party convened by the Planning Committee of Berkhamsted Town Council to assess and reply to the consultation on the Regulation 18 Draft Local Plan issued in November 2020. The comments have been assembled by Councillors and residents to reflect the concerns of local citizens on these matters.</p> <p>We are conscious that the preparation of the Draft Plan by the Borough's Officers has been a mammoth task over many years. We commend their work which has drafted a coherent Plan that updates the multiplicity of documents that comprise the Policies set out by the Adopted Core Strategy of 2013. However, much that follows in this response and the reply to the questions posed will be at odds with the Draft Plan's intention that the Borough should meet the directive on the 'target' number of dwellings determined by the Ministry of Housing Communities and Local Government.</p> <p><b>Summary</b></p> <p>This Council is dismayed that the Draft Plan of 2020 provides for the excessive increases in the population and number of houses to be built over the Plan period 2020 -2038. We cannot agree to this as the projections by ONS do not support</p>

the increase planned for. Adopting the proposals in the Draft Plan results in substantial incursions into the Green Belt, including sites on the edges of Berkhamsted<sup>1</sup>, with adverse impact on parts of the AONB.

To restate much of our reply to the 2017 Reg18 ‘consultation’, future development of Berkhamsted should be consistent with the Core Strategy [2006 – 2031] adopted as recently as September 2013. The house building rates and the Green Belt releases around the market towns that were suggested in some options (*to the 2017 proposals*) are a significant departure from existing policies in the Core Strategy. Adopting an option that requires large Green Belt releases around the market towns would mean that the Settlement Hierarchy described in the Core Strategy will have been abandoned notwithstanding what is asserted in the Draft Plan. The Core Strategy must carry significant weight in the development of the Local Plan.

We note the Statement by the Minister of State Robert Jenrick of 16th December 2020 on the recent consultation (Changes to the Planning System Aug 2020) :

*“There were many 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 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 is crucial that planning is more certain and more transparent, so we will explore how we can make this clearer through our longer-term planning reforms, including considering the right name for this approach.*

1 The Draft Plan refers Berkhamsted with Northchurch

*There is widespread support for ensuring enough homes are built across England to ensure the needs of our communities are met. We heard clearly through the consultation that the building of these homes should not come at expense of harming our precious green spaces. We also heard views that this need can be better met in existing urban areas.”*

This conflicts with the proposed releases of Green Belt in the Draft Plan to meet the proposed allocation of housing, especially on the edge of the major settlements, across the Borough.

Moreover, 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.**”*

The adoption of the Core Strategy, following the statutory consultation, with its commitment to the Settlement Hierarchy, would imply that large Green Belt releases around Market Towns 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.***

We note that the urban capacity of Hemel Hempstead has been revisited in light of recent statements from central government on the opportunity to increase building heights in suitable locations. We ask whether enough weight has been given to the prospective changes to town centres following the COVID19 crisis with many premises likely to be converted to include dwellings. A revised and increased urban capacity for the Borough's main centre would reduce the need to provide for more Green Belt releases.

The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will have been deployed by 2020 (11 years ahead of target) while the rest of Dacorum lags behind target. Such disparities within Dacorum must be taken into account when assessing development numbers and site options going forward.

Infrastructure deficits are now evident across the Borough and only the provision of housing on large sites can deliver the necessary supporting infrastructure without detrimentally impacting on existing settlements. Notwithstanding, contributions from Developers' S106 and CIL will not meet the full cost of investment in local infrastructure: that will require new Government funding without which residents will continue to suffer the adverse effects of infrastructure deficits.

The blanket assumption that large-scale growth makes delivery of infrastructure easier is misplaced – it will depend on the site and the viability. In the Dacorum Strategic Infrastructure Study [Feb. 2011] this is clearly stated:

*“By contrast there are certain types of infrastructure that are more sensitive to the location of demand. Ideally, these types of infrastructure should be located close to the population that they are intended to serve as the extent of the area that they serve (in other words their “catchment”) is very local.”*

It is manifestly the case that the infrastructure of Berkhamsted is not fit for purpose in relation to current needs let alone any future housing development of the scale proposed by this Draft Plan.

We refer in particular to:

**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.

**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.

**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.

**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.

**Infrastructure Development Plan;** the Draft Plan references ‘Masterplans’ to guide development of major sites. Notable for their absence are proposals that link or integrate the sites with the host community viz roads/walking/cycling/footpaths together with prospective costs which must be included in the respective IDP.  
Comments on the Consultation Questions follow on the next pages.

<b>Included files</b>	
<b>Title</b>	Spatial Strategy for Growth
<b>ID</b>	EGS15752
<b>Person ID</b>	1271978
<b>Full Name</b>	JOANNA HARLEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Spatial Strategy for Growth comment</b>	<p>With the proviso that this Council considers the Housing Growth numbers in the Plan is based on flawed assumptions, we note the text in Para 5.3 – 5.5 [P30] :</p> <p><i>“5.3 – The spatial strategy aims to deliver the significant uplift in growth in a sustainable way across the Borough, seeking out opportunities to regenerate Hemel Hempstead and to continue to act as a catalyst for its transformation. Elsewhere, we are looking to accommodate growth that supports the long term function of the towns and villages and that delivers sufficient growth to provide much needed investment in infrastructure. We know that we cannot accommodate all the growth within the urban area, so despite our approach to increasing densities and heights, we do need to release land in the Green Belt.</i></p> <p><i>5.4 – The strategy focuses growth in and around the most sustainable settlements in the Borough, principally Hemel Hempstead, Berkhamsted and Tring through utilising urban land as well as through extensions to each settlement. Hemel Hempstead’s growth will be focused through much greater urban intensification reflecting the wider availability of development opportunities and the sustainability of the town and access to services, facilities and employment. The expansion of the town will be focused to the north and east of the Hemel Hempstead, with further land removed from the Green Belt to meet longer term needs.</i></p> <p><i>5.5 – The Growth Strategy for Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated</i></p>

*mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.”*

We acknowledge and welcome the statement “... but will not pursue an urban intensification strategy that detracts from the character of these locations.” However there have been many householder planning applications where greater densification has eroded former Character Area guidance hence becoming the new default.

The proposed release of Green Belt around Berkhamsted cannot be described as being ‘*sustainably located close to passenger transport and other services, facilities and employment opportunities*’.

**Policy SP2 – the strategic thrust of this policy (Spatial Strategy for Growth) is not supported** given that it is based on the contentious growth numbers.

We comment further at **5.A**

Policy SP2 – Spatial Strategy for Growth includes statement in 3 b.

*“b. – Berkhamsted will accommodate growth of at least 2,200 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.”*

*The Adopted Core Strategy (2013-2036) para 6.2.8 identified capacity (not “need”) in Berkhamsted of 600. Only eight years later this statement indicates that Berkhamsted will have an additional 1600 homes imposed upon it.*

The Town Centre already suffers from congestion and suspect air quality, viz data for Lower Kings Road shows the level of NO<sub>2</sub> in some periods exceed the 40micrograms/cm<sup>3</sup> limit, albeit that the annual record does not show exceedances. In many respects at its current size and topography the Town has reached the limits of capacity as evidenced by traffic congestion, shortage of school places at primary and secondary levels, GP and associated services, sports facilities and in-town open space. We dispute that the substantial increase imposed on the Town will enhance the quality of life for residents current or future.

Nonetheless Council welcomes the sentiments of SP2. 4

*“4. – Development that does not fit with the scale, distribution or requirements of this policy will not be permitted.”*

We have qualified support for SP2.5 with its comment on Neighbourhood Plans: additional growth may not be compatible with community aspirations for their locality.

**Included files**